BLM LIBRARY
88013136

GUNNISON BASIN
and the
AMERICAN FLATS/SILVERTON
WILDERNESS

FINAL ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MONTROSE DISTRICT, COLORADO

United States Department of the Interior

IN REPLY REFER TO
CO-931
8500

BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
2850 YOUNGFIELD STREET
LAKEWOOD, COLORADO 80215

NOTICE

The Final Environmental Impact Statement (FEIS) on the Gunnison Basin and the American Flats-Silverton Wilderness study has been completed. This FEIS incorporates public and other government agency review comments that were received during the public review period. Reviewers' comments were made at public hearings and by letter. These comments and BLM's responses are included within this document.

The FEIS is not the decision-making document. A Record of Decision in the form of a Wilderness Study Report, will be prepared for signature by the Secretary of the Interior. The recommendations as to the suitability of the WSAs discussed in the FEIS for designation as wilderness will be presented in this Wilderness Study Report. The Secretary will review this report and then submit his recommendations to the President by 1991. The President then has two years to submit his recommendations to the Congress for their action. Only the Congress can decide which areas will be designated wilderness.

On behalf of my staff, I want to express my appreciation for the time and effort so many people took in commenting on each of the WSAs.

Sincerely,

Neil F. Morck
State Director

#16517546

ID88013136

QH
76.5
.C6
G866
1987

FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED WILDERNESS DESIGNATION OF THE WILDERNESS STUDY AREAS WITHIN THE GUNNISON BASIN AND AMERICAN FLATS/SILVERTON PLANNING UNITS OF THE

MONTROSE DISTRICT, COLORADO

RECEIVED
BUREAU OF LAND MANAGEMENT
AUG 1987
BUREAU OF LAND MANAGEMENT
RENO, NEVADA

Prepared by

Bureau of Land Management
Department of the Interior

State Director
Bureau of Land Management

Abstract: This Environmental Impact Statement considers a proposed action and alternatives for five Wilderness Study Areas (WSAs) in the Gunnison Basin and American Flats/Silverton Planning Unit. The WSAs considered are Redcloud Peak, 40,575 acres; Handies Peak, 18,860 acres; American Flats, 4,710 acres; Larson Creek, 900 acres; and Bill Hare Gulch, 370 acres. The proposed action and alternatives analyze and compare various acreages for designation or non-designation as wilderness.

For Further Information Contact:

Terry Reed
Area Manager
Bureau of Land Management
216 North Colorado
Gunnison, Colorado 81230
Telephone: 303-641-0471

Type of Action: Legislative

Date EIS Made Available to the EPA and the Public:

Draft: April 9, 1982
Final: August 7, 1987

BLM Library
D-553A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047

TABLE OF CONTENTS

SUMMARY.....iii

CHAPTER 1--PURPOSE AND NEED.....1

CHAPTER 2--ALTERNATIVES INCLUDING THE PROPOSED ACTION.....13

CHAPTER 3--AFFECTED ENVIRONMENT.....45

Introduction.....45
Common Resource Values.....45
Redcloud Peak.....49
Handies Peak.....58
American Flats.....64
Bill Hare Gulch.....69
Larson Creek.....73

CHAPTER 4--ENVIRONMENTAL CONSEQUENCES.....77

Assumptions.....77
Energy Requirements and Conservation Potential.....78
Non-Affected Resources.....78
Redcloud Peak.....78
Hanides Peak.....92
American Flats.....101
Bill Hare Gulch.....106
Larson Creek.....107

CHAPTER 5--CONSULTATION AND COORDINATION.....115

SUPPORT DATA.....211

List of Preparers.....212
Glossary.....216
References.....218
Appendix.....220

BLM Library
D-553A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047

LIST OF MAPS

Map 1-1 General Location Map.....2
Map 1-2 Location of WSAs.....3
Map 1-3 Wilderness Study Areas .....Pocket
Map 3-1 Redcloud Peak-Soils.....50
Map 3-2 Handies Peak-Soils.....60
Map 3-3 American Flats-Soils.....65
Map 3-4 Bill Hare Gulch and Larson Creek-Soils.....70

LIST OF TABLES

Table 1-1 Land Status Within Suitable Area.....11
Table 2-1 Comparison of Impacts-Redcloud Peak.....29
Table 2-2 Comparison of Impacts-Handies Peak.....35
Table 2-3 Comparison of Impacts-American Flats.....39
Table 2-4 Comparison of Impacts-Bill Hare Gulch.....42
Table 2-5 Comparison of Impacts-Larson Creek.....43
Table 4-1 Short Term Uses Vs. Long Term Productivity.....110

This environmental statement (EIS) analyzes the affects of wilderness designation or nondesignation on five Wilderness Study Areas (WSAs) totalling 65,415 acres. These areas are within the Gunnison Basin and American Flats/Silverton planning units. A listing of these WSAs and a summary of the proposed action for each is shown in the following table.

Area	Study Authority FLPMA	Acres Non-Suitable	Acres Suitable
Redcloud Peak (CO-030-208)	Sec. 603	10,175	30,400
Handies Peak (CO-30-241)	Sec. 603	10,975	7,885
American Flats (CO-030-217)	Sec. 202	3,205	1,505
Bill Hare Gulch (CO-030-085)	Sec. 202	370	0
Larson Creek (CO-030-086)	Sec. 202	900	0
		25,625	39,790

ALTERNATIVES

Redcloud Peak (CO-030-208)

Proposed Action (Conflict Resolution Alternative I)

Under this alternative 30,400 acres would be recommended as suitable and 10,175 acres would be recommended as nonsuitable for wilderness designation.

Wilderness values on 30,400 acres would be afforded the protection provided by wilderness designation. However, as a result of valid existing rights, some mineral development could potentially occur within this area in Silver and Cooper Creeks. Although the projected mines would only disturb 20 to 40 acres they could impact wilderness values on approximately 2,000 acres in these drainages. In addition, wilderness values would be lost on the 10,175 acres recommended nonsuitable if a large scale alunite mine and two other small scale mines are developed and continued exploration takes place.

Except as noted above mineral exploration and development would be precluded on the 30,400 acres recommended suitable. With the exception of the projected valid rights, the high potential for discovery in this portion of the WSA would be foregone. The 10,175 nonsuitable acres would remain open to entry.

The recreation setting would continue to be a primitive backcountry type except in the vicinity of the alunite mine where it would be changed to one dominated by the sights and sounds related to the mining activity. Existing use of 4500 Recreation User Days would increase by 9 percent annually in the suitable portion and the 500 RUDs in the nonsuitable area would increase by about 5 percent annually.

Alunite development would disturb soils on 495 acres, impact water quality and displace 50 to 80 deer and 100 to 130 elk.

All Wilderness Alternative

The entire 40,575 acres would be recommended suitable under this alternative.

Wilderness values would be protected throughout the entire WSA although valid existing rights would allow for the development of about five small scale mines. This could result in the loss of wilderness values on about 3,000 acres.

Alunite would not be developed resulting in the potential of 4 million tons of alunite ore not being produced annually. With the exception of projected valid rights the high potential for discovery in this WSA would be foregone.

The recreation setting would continue to be a primitive backcountry type throughout the WSA. Without alunite development use would increase in the eastern portion of the WSA. Overall the current use of about 5000 RUDs would increase by about 9 percent annually.

No Wilderness Alternative

All 40,575 acres would be recommended as nonsuitable for wilderness designation.

None of wilderness values in the WSA would receive legislative protection. As a result of projected mineral activity wilderness values would be lost on about 11,000 acres although in the long term wilderness values are expected to be lost on the entire 40,575 acres.

The entire WSA would remain open to mineral entry. Development is projected to occur in Cooper and Silver Creek, along the northern edge of the WSA and for alunite on Red Mountain.

The recreation setting would continue to be a primitive backcountry type except in the vicinity of the alunite mine where it would change to one dominated by the sights and sounds of mining activity. Use would increase by 5 percent annually.

Alunite development would disturb soils on 585 acres, impact water quality and displace 50 to 90 deer and 100 to 130 elk.

Wilderness Manageability Alternative

This alternative would recommend 37,530 acres suitable and 3,045 acres nonsuitable for wilderness designation.

Wilderness values on 37,530 acres would be afforded the protection provided by wilderness designation. However, as a result of valid existing rights, some mineral development could potentially occur within this area in Silver and Cooper Creeks. Although the projected mines would only disturb 20 to 40 acres they could impact wilderness values on approximately 2,000 acres in those drainages. Wilderness values would potentially be lost on all of the 3,045 acres recommended nonsuitable as a result of two small scale mines and continued mineral exploration.

Except as noted above mineral exploration and development would be precluded on the 37,530 acres recommended suitable. The high potential for discovery in this portion of the WSA would be foregone. The 3,045 nonsuitable acres would remain open to entry. Alunite would not be developed resulting in the potential 4 million tons of alunite ore not being produced annually. The recreation setting would continue to be a primitive backcountry type. Use of this area for hiking, camping and mountain climbing would increase by about 9 percent annually.

Conflict Resolution Alternative II

This alternative would designate 11,140 acres as suitable and 29,435 acres nonsuitable for wilderness.

Wilderness values on 11,140 acres would be afforded the protection provided by wilderness designation. However, as a result of valid existing rights, some mineral development could potentially occur within this area in Silver and Cooper Creeks. Although the projected mines would

only disturb 20 to 40 acres they could impact wilderness values on approximately 2,000 acres in these drainages. Wilderness values would be lost on at least 9,000 of the 29,435 acres recommended nonsuitable if a large scale alunite mine and two other small scale mines are developed. In the long term it is expected that wilderness values would be lost on the entire 29,435 acres recommended nonsuitable.

Except as noted above mineral exploration and development would be precluded on the 11,140 acres recommended suitable. The high potential for discovery in this portion of the WSA would be foregone. The 29,435 nonsuitable acres would remain open to entry.

The recreation setting would continue to be a primitive backcountry type except in the vicinity of the alunite mine where it would be changed to one dominated by the sights and sounds of mining activity. Use would increase by 9 percent annually in the suitable portion and remain low in the nonsuitable area.

Alunite development would disturb soils on 520 acres, impact water quality and displace 50 to 80 deer and 100 to 130 elk.

Handies Peak (CO-030-291)

Proposed Action (Conflict Resolution Alternative)

Under this alternative 7,885 acres would be recommended as suitable and 10,975 acres would be recommended as nonsuitable.

Wilderness designation would provide protection to wilderness values on 7,885 acres with the exception of about 1,000 acres that could be affected if projected mineral activity takes place in the American Basin area. Wilderness values could be lost on 400 of the 10,975 acres recommended nonsuitable as a result of mineral development on private property near Campbell Creek. An additional 10 to 20 acres would be lost to mineral exploration. However, in the long term it is expected that wilderness values would eventually be lost on the entire 10,975 acres recommended nonsuitable.

The 7,885 acres recommended suitable would be withdrawn from entry, although three mines are projected to be developed for production of base and precious metals based on valid existing rights. With the exception of these valid rights, the high potential of this portion of the WSA would be foregone. One small scale mine is projected to be developed within the nonsuitable area.

The 7,885 acres recommended as suitable would continue to provide a primitive backcountry recreation setting although mineral development could change some of that within American Basin to one influenced by the sights and sounds on mining activity. The area around Campbell Creek would also change to a setting influenced by mining activity. The current use in the suitable area, estimated to be 3000 RUDs would increase by about 9 percent annually.

Soil would be disturbed and productivity lost on up to 135 acres, water quality would be adversely affected and bighorn sheep populations would be affected by mineral exploration within the nonsuitable area.

All Wilderness Alternative

The entire 18,860 acres would be recommended as suitable for wilderness designation with this alternative. Designation would provide protection to 18,860 acres. Although potential development of valid rights in the American Basin area and near Campbell Creek could result in loss of wilderness values on 1,400 acres.

The entire 18,860 acres would be withdrawn from mineral entry. Valid rights would

allow for development of base and precious metals in the American Basin and Campbell Creek areas With the exception of these valid rights the high mineral potential within this WSA would be foregone.

The existing primitive backcountry recreation setting would be maintained except where altered by mineral development. The existing 4000 RUDs of use would increase by 9 percent annually.

Soil productivity would be lost on up to 115 acres, water quality wuld be protected and wildlife habitat would be protected with the preclusion of mineral exploration activity.

No Wilderness Alternative

None of the 18,860 acres would be recommended as suitable for wilderness designation.

Wilderness values would be lost on about 1,400 acres as a result of mineral activity in American Basin and near Campbell Creek. Wilderness values would be unprotected on the remaining acreage and are expected to be lost eventually on the entire 18,860 acres.

The entire WSA would remain open to mineral entry. Production of base and precious metals, uranium, and strategic minerals is predicted to occur.

The existing primitive backcountry recreation setting would remain except where altered by mineral development. The existing 4000 RUDs of use would increase by about 5 percent annually.

Soil productivity would be lost on up to 155 acres, water quality would be degraded and elk and bighorn sheep populations would be affected by mineral exploration and development.

Wilderness Manageability Alternative

With this alternative 8,220 acres would be recommended suitable and 10,640 acres recommended nonsuitable for wilderness designation.

Wilderness designation would provide protection to 8,220 acres although about 1,400 of those acres could be affected if projected mineral developments take place. About 10 to 20 acres could be lost within the nonsuitable area as a result of mineral exploration. The entire 10,640 acres recommended nonsuitable would eventually be lost.

The 8,220 acres recommended as suitable would be withdrawn from mineral entry. Valid existing rights would allow for development of three mines in American Basin and one near Campbell Creek. With the exception of these valid rights, the high mineral potential in this portion of the WSA would be foregone. No development is projected in the nonsuitable portion of the WSA.

The 8,220 acres recommended as suitable would continue to provide a primitive backcountry recreation setting although mineral development could change some of that within American Basin and near Campbell Creek to one influenced by the sights and sounds on mining activity.

Soil productivity would be lost on up to 135 acres, water quality would be degraded and bighorn sheep population would be affected by mineral development and exploration.

American Flats (CO-030-217)

Proposed Action (Conflict Resolution Alternative)

Under this alternative 1,505 acres would be recommended as suitable for wilderness designation and 3,205 acres as nonsuitable. The 1,505 acres recommended suitable would receive the protection provided by wilderness designation. Wilderness values could be lost on about 315 acres within the

nonsuitable area if projected of mineral exploration and development occurs. It is expected that wilderness values would eventually be lost on the 3,205 acres recommended nonsuitable.

Although the 1,505 acres recommended suitable would be withdrawn there should be no impact on potential development since potential is low. The remaining area would remain open to entry with one mine projected in the southeast portion of the WSA.

The backcountry recreation setting would be maintained in both the suitable and nonsuitable areas except in the vicinity of the mineral development where it would be influenced by the sights and sounds of mining activity. The existing use in the suitable portion of 1200 RUDs would increase by about 9 percent annually.

Mineral exploration and development would result in a loss of soil productivity on up to 40 acres, and an unquantified degredation of water quality in Henson Creek.

All Wilderness Alternative

The entire 4,710 acres would be recommended as suitable for wilderness designation.

Wilderness values would be protected on all but 300 acres where they could be lost due to mineral development.

Exploration would be precluded with the entire 4,710 acres. Development of one mine in the southeastern portion of the WSA is projected to occur as a result of valid existing rights.

The backcountry recreation setting would be maintained except in the vicinity of projected mineral development where it would be affected by the sights and sounds of mining activity. The existing use of 1500 RUDs would increase by about 9 percent annually.

Soil productivity would be lost on up to 25 acres and water quality would be degraded in Henson Creek as a result of mineral development.

No Wilderness Alternative

The entire 4,710 acres would be recommended as nonsuitable for wilderness designation.

Wilderness values could be lost on up to 320 acres as a result of projected mineral activity. It is expected that in the long term wilderness values would eventually be lost on the entire 4,710 acres.

The entire WSA would remain open to mineral entry with production of base and precious metals projected.

The existing backcountry recreation setting would remain except where altered by mineral development. Use of the area would increase over the existing 1500 RUDs by about 5 percent annually.

Mineral development would result in a loss of soil productivity on up to 40 acres and a reduction in water quality in Henson Creek.

Bill Hare Gulch (CO-030-085)

Proposed Action (No Wilderness Alternative)

None of the 370 acres would be recommended as suitable for wilderness.

Wilderness values, which exist only in conjunction with the adjacent Big Blue Wilderness, would not receive legislative protection. However, since the area has low mineral potential and no developments are predicted, wilderness values are not likely to exceed 100 RUDs annually.

All Wilderness Alternative

The entire 370 acres would be recommended as suitable for designation.

Wilderness values would be legislatively protected in the long term. No impacts are expected due to mineral development since the area's potential is low and no development is predicted. Recreation use would not exceed 100 RUDs annually.

Wilderness Manageability Alternative

Under this alternative 325 acres would be recommended as suitable for designation.

Wilderness values would be protected on 325 acres. Since mineral potential is low and no development is expected, wilderness values would be unaffected on the 45 acres recommended nonsuitable as well. Recreation use would not exceed 100 RUDs annually.

Larson Creek (CO-030-086)

Proposed Action (No Wilderness Alternative)

None of the 900 acres would be recommended as suitable for wilderness.

Wilderness values, which exist only in conjunction with the adjacent Big Blue Wilderness, would not receive legislative protection. However, since the area has low mineral potential and no developments are predicted, wilderness values would not be affected. Recreation use would remain at about 20 RUDs.

All Wilderness Alternative

The entire 900 acres would be recommended as suitable for designation.

Wilderness values would be legislatively protected in the long term. No impacts are expected to mineral development since the area's potential is low and no development is predicted. Recreation use would remain at about 20 RUDs.

Wilderness Manageability Alternative

Under this alternative 480 acres would be recommended as suitable for designation.

Wilderness values would be protected on 480 acres. Since mineral potential is low and no development is expected, wilderness values would be unaffected on the 420 acres recommended nonsuitable as well. Recreation use would remain at about 20 RUDs.

CHAPTER 1

PURPOSE AND NEED

This Environmental Impact Statement (EIS) analyzes the potential impacts of designating or not designating five Wilderness Study Areas (WSAs) totalling 65,415 acres into the National Wilderness Preservation System.

The five BLM WSAs under study in this Gunnison Basin and American Flats/Silverton Wilderness EIS are (see Map 1-1 and 1-2):

WSA	Acreage
Redcloud Peak (CO-030-208)	40,575
Handies Peak (CO-030-241)	18,860
American Flats (CO-030-217)	4,710
Larson Creek (CO-030-086)	900
Bill Hare Gulch (CO-030-085)	370
TOTAL	65,415

BACKGROUND

BLM's wilderness program is a result of the Federal Land Policy and Management Act (FLPMA) of 1976 (Public Law 94-579). FLPMA is Congress' basic guidance to the BLM on how to manage the 470 million acres of public lands.

One portion of FLPMA (Section 603[a]) directs the Secretary of the Interior and the BLM to inventory public lands to identify those that have wilderness characteristics. Lands with wilderness characteristics must then be studied to determine their suitability or nonsuitability for wilderness. Based on an evaluation of wilderness and other resource use/values in each area determined to contain wilderness characteristics, the Secretary must report his recommendations to the President no later than October 21, 1991, on whether areas should be designated as wilderness. The President must report his final recommendations to Congress within two years. Congress will decide if any of these recommended areas are to become wilderness or not.

To accomplish the mandate of Section 603 of FLPMA, the BLM has developed a framework for the wilderness review process which has three phases:

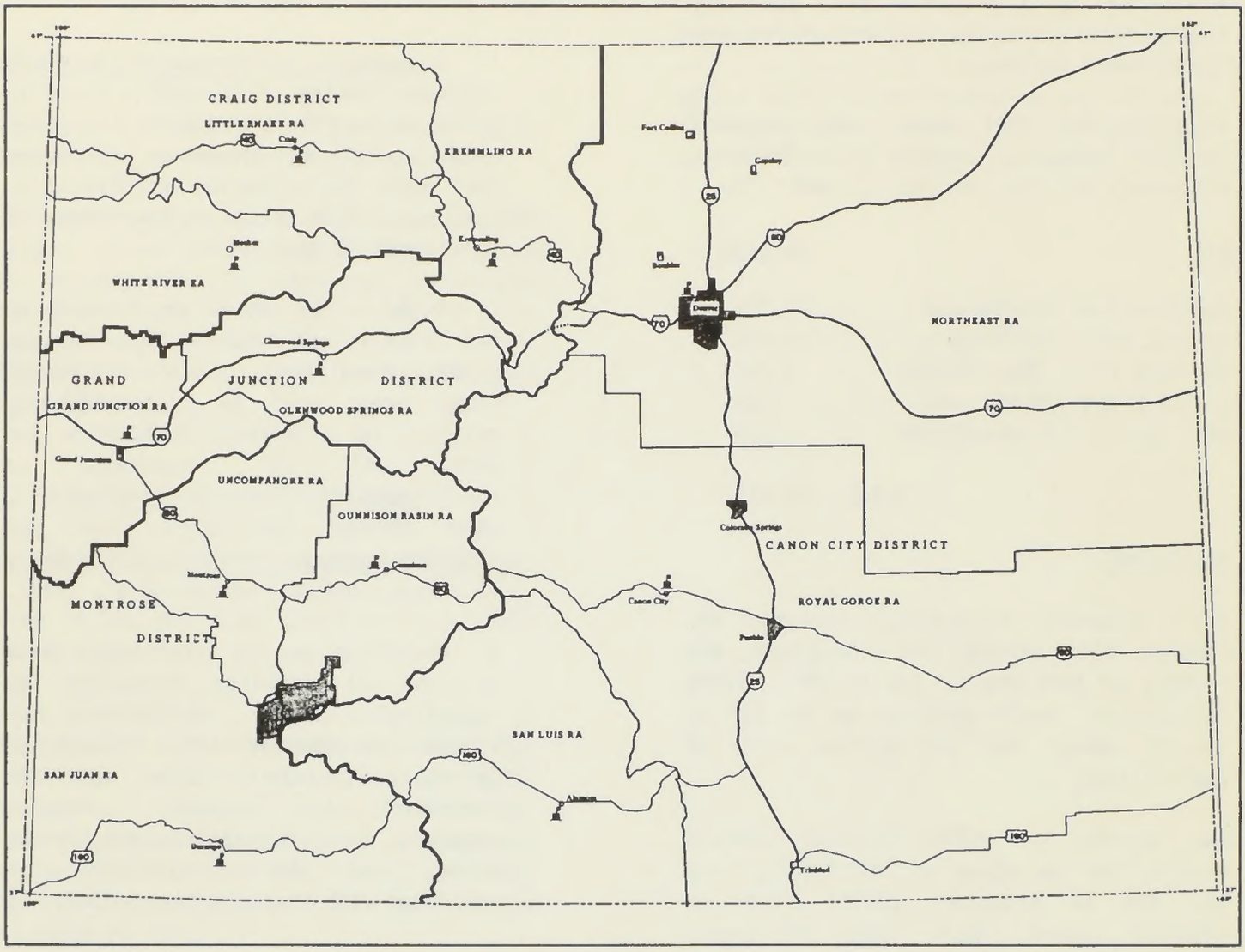
1. Inventory - The inventory phase involves looking at the public lands to determine and locate the existence of areas containing wilderness resources that meet the criteria established by Congress. Such areas are identified as Wilderness Study Areas.

2. Study - The study phase involves the process of determining, through careful analysis, which Wilderness Study Areas will be recommended as suitable for wilderness designation and which will be recommended as nonsuitable. These determinations, made through the BLM's land use planning system, consider all values, resources, and uses of the public lands.

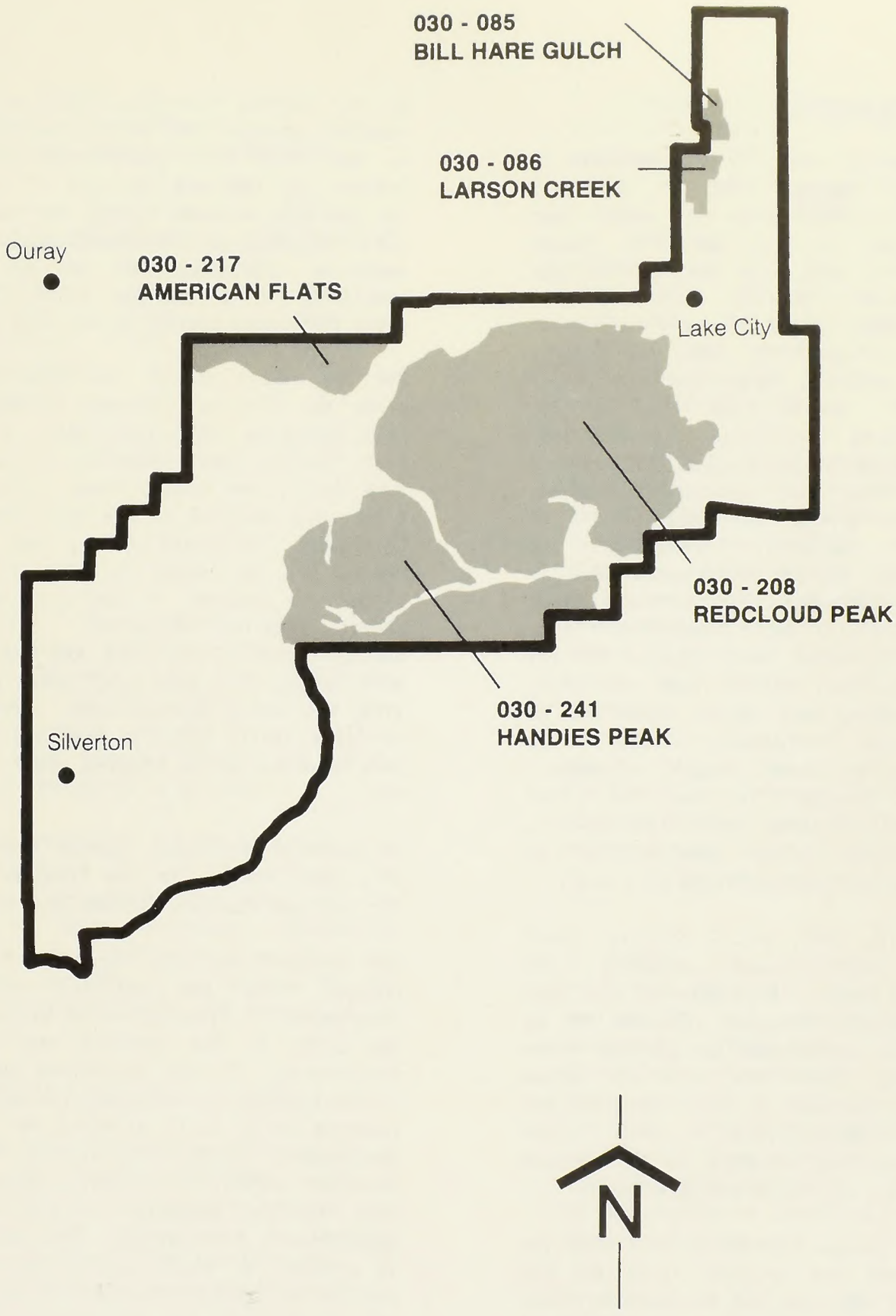
3. Reporting - The reporting phase consists of actually forwarding or reporting these suitable and nonsuitable recommendations through the Secretary of the Interior and the President to Congress. Mineral surveys, Environmental Impact Statements, and other data are also submitted with these recommendations.

The inventory phase of the process, completed in December 1980, identified 11 WSAs in the Gunnison Basin and American Flats/Silverton Planning Units (see Map in pocket). At the beginning of this study effort, three of these WSAs were contiguous to U.S. Forest Service study areas or planning areas. These three WSAs, Sparling Gulch/Friends Creek (CO-030-088/213), Slumgullion Slide (CO-030-211), and West Needles Contiguous (CO-030-229A), were studied separately in conjunction with Forest Service land use plans. The other eight WSAs were included in the DEIS which was released in May 1982.

STATE OF COLORADO



General Location Map
Map 1-1



Map 1 - 2

Location of Wilderness Study Areas within the Gunnison Basin and American Flats - Silverton Planning Unit

CHANGES FROM DRAFT EIS

On December 30, 1982, it was announced in the Federal Register (Vol. 47, No. 251) that by Secretarial Order all areas under 5,000 acres in size were no longer considered as WSAs, and that split-estate acreage (Federal surface, State minerals) would no longer be considered as a part of the WSA. On March 17, 1983, the Federal Register announced that American Flats (CO-030-217), Needle Creek (CO-030-229B), and Weminuche Contiguous (CO-030-238B) would continue to be studied for possible inclusion into the National Wilderness Preservation System under Section 202 of FLPMA. Bill Hare Gulch (CO-030-085) and Larson Creek (CO-030-086), which were in the DEIS; and Sparling Gulch/Friends Creek (CO-030-088/213), and Slumgullion Slide (CO-030-211), which were studied in the Gunnison National Forest land use plan, were determined not to be WSAs and no longer under wilderness review. In addition to the above changes, adjustments in WSA acreage in Redcloud Peak (CO-030-208), Handies Peak (CO-030-241), and Whitehead Gulch (CO-030-230B) as affected by split-estate lands were made.

On April 18, 1985, a U.S. District Court decision was issued vacating the Secretarial Order. Consequently, the four areas initially dropped continue to be studied for wilderness designation under Section 202. Bill Hare Gulch and Larson Creek are included in this document and Sparling Gulch/Friends Creek and Slumgullion Slide continue to be analyzed in the Forest Service planning effort.

A further change occured in 1983 when the Public Lands and National Parks Act (97 Stat. 909) adjusted the San Juan National Forest boundary to include all or parts of four BLM WSAs. All of the Needle Creek WSA and portions of Whitehead Gulch, Weminuche Contiguous and West Needles Contiguous were affected (see Map 1-2). The BLM portion of West Needles Contiguous continues to be studied jointly with the Forest Service. As identified in a cooperative agreement between the Montrose District of BLM and the San Juan National Forest, the remaining BLM portions of Whitehead Gulch and Weminuche Contiguous WSAs are now being considered in a separate joint EIS for which the Forest Service is the lead agency.

The net result of all the above changes since the DEIS was released is that this FEIS addresses only five WSAs, Redcloud Peak, Handies Peak, American Flats, Bill Hare Gulch, and Larson Creek. The other three WSAs analyzed in the DEIS, Weminuche Contiguous, Whitehead Gulch, and Needle Creek, are no longer in this EIS, but rather are covered in San Juan National Forest planning documents. Bill Hare Gulch, Larson Creek, and American Flats WSAs, being less than 5,000 acres each in size, are being studied under Section 202 of FLPMA, while Redcloud Peak and Handies Peak continue to be studied under Section 603.

In addition to these changes there were also some changes in the Proposed Action for Redcloud Peak and Handies Peak WSAs.

For Redcloud Peak the Proposed Action was changed from the Conflict Resolution Alternative II Alternative, as presented in the DEIS, to the Conflict Resolution I Alternative. It was determined that this alternative better protected the wilderness resource while still allowing for mineral development, particularly alunite. As the Proposed Action, some modifications were made to the boundary in the Conflict Resolution I Alternaitve. These were made as a result of input received on the DEIS and are considered to be minor in nature.

The boundary of the Proposed Action for Handies Peak was also modified as a result of input on the draft. Again, these adjustments are minor in nature. The

overall changes in the acres being recommended as suitable from the draft to the final are summarized as follows.

Area	DEIS Acres Suitable	FEIS Acres Suitable
Redcloud Peak	11,140	30,400
Handies Peak	7,120	7,885
American Flats	1,505	1,505
Bill Hare Gulch	0	0
Larson Creek	0	0
	19,765	39,790

SCOPING

A series of scoping and issue identification meetings were held in Gunnison, Montrose, Lake City, Silverton, and Denver, Colorado. These meetings were used to identify any new issues, solicit resource data from the public, and explain the study procedures to be used.

A second series of scoping meetings were held in August of 1981 to present the proposed alternatives for each of the WSAs. At these workshops, information pertaining to a preferred alternative was solicited, as well as a request for any additional alternatives not addressed by BLM.

ENVIRONMENTAL ISSUE IDENTIFICATION

BLM used the information obtained as a result of scoping meetings, comments received during the inventory process, and input from BLM professionals to identify concerns associated with the five WSAs. Of these, the following were determined to be important issues and are analyzed in the FEIS.

1. Effects on Wilderness Values - The wilderness values of naturalness, solitude, primitive recreation and various special resource values could benefit from wilderness designation. The same values may be adversely affected by uses that would occur should the WSAs not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in all five WSAs addressed in this EIS.

2. Effects on Development of Mineral Resources - Wilderness designation could affect the exploration and development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing mineral claims within designated wilderness areas could be affected by wilderness management restrictions. Oil and gas and salable minerals do not exist in any of the WSAs and are not an issue. The impact of wilderness designation on the exploration and development of potential and known mineral resources is an issue for analysis in all five WSAs.

3. Effects on Recreation Use - Wilderness designation could affect the availability of opportunities for motorized recreation. If not designated, development activities could result in a shift in recreation use from primitive backcountry type settings to those affected by roads and other man made intrusions. The effect of designation or nondesignation is an issue in all five WSAs.

4. Effects on Access - Designation as wilderness could place constraints on

access to valid mining claims, patented mining claims, and State mineral lands. Conversely, access to these lands could have adverse effects on wilderness values. Access is an issue in American Flats, Redcloud Peak, and Handies Peak WSAs.

5. Effects on Water Quality - Water quality could be affected by road construction and mineral exploration and development. As a result of valid existing rights, mineral development is expected to be the same with or without wilderness designation in all but the Redcloud Peak WSA. The Red Mountain alunite deposit is projected to occur only in the absence of wilderness designation. In addition, given the potential of mineral discovery in the Redcloud Peak, Handies Peak, and American Flats WSAs exploration activity is expected to occur in these WSAs if not designated wilderness. Therefore, water quality is an issue for these three WSAs.

6. Effects on Soil Erosion - Soil erosion could be affected by development activity associated with mineral exploration and development. As a result of valid existing rights in four of the WSAs, development is not expected to be significantly different with or without wilderness designation. Development of the Red Mountain alunite deposit in the Redcloud Peak WSA is expected to occur only if the area is not designated wilderness. In addition, mineral exploration is expected to occur in the Redcloud Peak, Handies Peak, and American Flats WSAs if not designated wilderness. Therefore, due to projected development and/or exploration activity, soil erosion is an issue for these three WSAs.

7. Effects on Wildlife - Wildlife could be affected by mineral exploration and development. As a result of valid existing rights development is not expected to be significantly different with or without wilderness designation in four of the WSAs. Development of the Red Mountain alunite deposit in the Redcloud Peak WSA is expected to occur only if the area is not designated wilderness. Exploration activity is projected to occur in Redcloud Peak, Handies Peak and American Flats WSAs if not designated wilderness. Therefore, due to projected mineral exploration and development, wildife is an issue in these three WSAs.

8. Effects on Air Quality - Air quality is identified as an issue in the Redcloud Peak WSA as a result of alunite development. Activities in the other four WSAs are not predicted to be significantly different with or without designation and, therefore, air quality is not an issue for these WSAs.

The following issues were identified in scoping, but were not selected for detailed analysis in this EIS. The reasons for setting each of these issues aside are discussed below.

1. Effects on Livestock Operations - Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have significant adverse economic impacts on their business. This issue was considered but dropped from detailed analysis because the BLM's wilderness management policy provides for the continued use of wilderness areas for livestock operations at historic levels. Although the

management practices of livestock operators in the five WSAs would be more closely regulated, they would continue as they did prior to wilderness designation subject to reasonable controls. The impact of wilderness designation on livestock operations as a result of curtailment of planned range developments is not considered an issue since no range developments exist nor are any planned.

2. Effects on Air Quality Classification - Concerns were raised regarding the interaction between wilderness designation and air quality classification. The wilderness management policy states that BLM will manage all wilderness areas to comply with the existing air quality classification for that specific area, so wilderness designation or non-designation would not cause the air quality classification to change. Therefore, this issue was dropped from further analysis in the EIS.

3. Effects on Cultural Resources - Generally, wilderness designation is not adverse to cultural resources because they will generally benefit from an area being designated as wilderness. Except for valid existing rights, such designation legally precludes development, land disturbances, motorized use, and other damaging or intrusive human effects. Most wilderness users tend to be sensitive to their environment and thus are far less likely to "pothunt" than others. Wilderness areas totally eliminate access by road and thus eliminate the use of vehicles or heavy equipment for vandalism purposes. A 1979 study (Nickens, et al., 1979) has confirmed that cultural sites more than one half a mile from a road are much less vandalized than those sites near a roadway. Inventory procedure is well-established and is done whenever surface disturbance occurs in a non-inventoried area. Mitigation for site loss or damage is normally done when a site qualifies for inclusion in the National Register of Historic Places. This is required by law. Mitigation can range from site excavation and analysis to site avoidance through project redesign. If an area is not designated wilderness, it may be opened to development such as oil and gas, roads, timber sales, and other surface disturbing activities. Such disturbance may cause destruction to significant cultural resources and can open up regions without previous access. Increased access can provide vandals and "pothunters" easy ability to loot and the damage to cultural resources can increase greatly. It should be noted, however, that most all development on the public lands requires inventory and mitigation for cultural resources, thus providing legal protection which occurs whether an area is designated as wilderness or not.

At the time a wilderness management plan is developed, procedures for the identification and protection of cultural resources will be considered as part of that process. This will inlcude inventory, when appropriate, mitigation as needed and consultation with the State Historic Preservation Officer as required uner 36 CFR 800.4. At present, no historic properties, as defined in 36 CFR Part 60 (National Register of Historic Places), are known to exist within the wilderness study areas included in this document. In those cases where significant cultural values are known to exist, or that are suspected to be present, the legislation that is developed must address access, and scientific or educational uses, that may be required.

4. Effects on Endangered Species - Wildlife and vegetation inventories and consultation with the U.S. Fish and Wildlife Service did not identify any threatened or endangered species in the WSAs. Therefore, this issue was dropped from further consideration.

5. Effects on Timber Production - None of the lands in any of the WSAs are under intensive forest management. Intensive management was determined incompatible with the primitive recreation use in this area. Therefore, timber production is not an issue.

6. Effects on Taxes and Income - Both patented and unpatented claims within the WSAs generate property taxes for Hinsdale and Ouray Counties. The unavailability of these lands for mining claims, if designated wilderness, would reduce this tax income. Total tax revenues for both patented and unpatented claims constituted less than three precent of the county's total tax income. Therefore, tax loss is not considered a significant issue. With the exception of Redcloud Peak WSA the level of mineral development is predicted to be the same with or without wilderness, and therefore effects on income are considered only for Redcloud Peak.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS

American Flats WSA

One comment received suggested the area between Engineer Pass and the south boundary of the WSA be considered as an alternative for study as wilderness. This area was eliminated during the intensive inventory phase and therefore, cannot be considered by the BLM during the study phase.

Handies Peak WSA

Several comments were received which recommended that that BLM land south and east of Cottonwood Creek and the adjacent U.S. Forest Service land be found as suitable for wilderness designation. The area of National Forest land was analyzed by the Forest Service and subsequently released from wilderness consideration during the RARE II process. Consequently, it was not appropriate to consider this area in the EIS.

Redcloud Peak WSA

Originally, the Conflict Resolution I Alternative for this WSA included the Alpine Gulch drainage. The boundary of this alternative was modified as the result of a comment at the Dever workshop that Alpine Gulch was a possible access route for the development of the alunite deposit on Red Mountain. Since the purpose of the original alternative was to provide a non-wilderness alternative for the alunite development and possible transportation routes, the boundary was modified accordingly.

PRESENT MANAGEMENT

These WSAs have been managed to protect wilderness resource values since passage of the Federal Land Policy and Management Act of 1976 (FLPMA). Section 603(c) of FLPMA states:

During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this act and other applicable laws in a manner so as not to impair the suitability of such areas for preservation as wilderness, subject, however, to the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in

which the same was being conducted on the date of approval of this act.

These lands were managed until December 12, 1979 under the State of Colorado Interim Management Policy which parallels FLPMA. Since December 12, 1979, these lands have been managed under the BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review. This document sets policy and guidelines for BLM management of lands under wilderness review.

Prior to the passage of FLPMA, the Redcloud Peak area was studied for possible BLM designation as a primitive area. The entire American Flats Planning Unit was considered for designation as the American Flats National Resource Lands Management Area. Neither of these considerations were made a part of the 1973 American Flats Management Framework Plan.

A scenic withdrawal in association with the "Loop Road" which encircles the Redcloud Peak WSA has been in effect since April 11, 1966.

Management of the entire area discussed in this EIS is also subject to the American Flats and Silverton Recreation Area Management Plan. This plan, approved in 1986, provides direction for the management of the special recreation values found in this area.

Earth Science, Inc. has applied for a preference right lease of 1,667 acres of public land for the purpose of developing a deposit of alunite (potassium aluminum sulfate). The area of the lease application is located on Red Mountain approximately three miles south of Lake City.

Earth Science, Inc. originally applied for a prospecting permit in 1970. Exploration drilling, three drill holes varying in depth from 306 feet to 688 feet, was completed in 1978. In March of 1979, Earth Science, Inc. submitted the "Initial Showing" for a preference right lease application. A condition in the prospecting permit issued to Earth Sciences stipulated that unless the deposit could be mined without significant adverse environmental effects, no lease would be issued. BLM initiated an environmental assessment in 1983 to resolve that issue. However, before the assessment process could be completed and a decision rendered, the Congress placed a prohibition on processing any lease within a WSA. Completion of the environmental assessment and decision are still pending.

PRIVATE LAND INHOLDINGS

There are 425 acres of private inholdings within two of the five WSAs. Various combinations of alternatives would contain different amounts of these private holdings (see Table 1-1).

In addition, there is a total of 2,340 acres of split-estate mineral inholdings within three of the five WSAs (see Table 1-1).

The compatibility of these inholdings with the wilderness values of the surrounding public lands may necessitate the need for land acquisition authority pursuant to any applicable wilderness legislation. Acquisition of these inholdings would not be necessary if the properties were used in a manner compatible with the management of the surrounding wilderness.

INTERRELATIONSHIPS

Forest Service: The American Flats, Bill Hare Gulch, and Larson Creek WSAs share boundaries with the Big Blue Wilderness Area administered by the Forest Service. These WSAs are all too small in acreage to qualify as separate wilderness areas. They would, of necessity, become part of their larger neighbors. As yet, there is no

administrative agreement between the BLM and the Forest Service as to which agency shall administer any designated wilderness additions to the Big Blue Wilderness Area.

State of Colorado: The State of Colorado holds the mineral rights, including the rights of access, to 2,340 acres within the Redcloud Peak, Handies Peak, and American Flats WSAs. Exploration and development of any minerals within the concerned lands would be covered under the statutes of the State. The compatibility of these rights with surface management for wilderness values may necessitate the acquisition of the mineral rights involved.

TABLE 1-1

LAND STATUS
WITHIN SUITABLE AREA

WILDERNESS STUDY AREA	ALTERNATIVE	ACRES GROSS	ACRES PRIVATE LAND	ACRES NET	ACRES STATE MINERALS
Redcloud Peak	All Wilderness	40,855	280	40,575	1,730
	No Wilderness	0	0	0	0
	Manageability	37,775	245	37,530	1,330
	Conflict Resolution I*	30,490	90	30,400	1,290
	Conflict Resolution II	11,190	50	11,140	0
Handies Peak	All Wilderness	19,005	170	18,860	600
	No Wilderness	0	0	0	0
	Manageability	8,320	100	8,220	400
	Conflict Resolution*	7,900	35	7,885	400
American Flats	All Wilderness	4,710	0	4,710	10
	No Wilderness	0	0	0	0
	Conflict Resolution*	1,505	0	1,505	0
Bill Hare Gulch	All Wilderness	370	0	370	0
	No Wilderness*	0	0	0	0
	Manageability	325	0	325	0
Larson Creek	All Wilderness	900	0	900	0
	No Wilderness*	0	0	0	0
	Manageability	480	0	480	0

* Proposed Action

CHAPTER 2

ALTERNATIVES INCLUDING THE PROPOSED ACTION

This EIS deals with five different wilderness study areas and examines from three to five alternatives for each. With the exception of the No Wilderness (No-Action) Alternative for each WSA, all alternatives propose recommending to Congress some lands as additions to the National Wilderness Preservation System. If designated, Bill Hare Gulch, Larson Creek, and American Flats would become part of the adjacent Big Blue Wilderness Area. Redcloud Peak and Handies Peak would become separate wilderness areas (see Map 1-2).

If designated by Congress, these additions to the National Wilderness Preservation System would be managed according to provisions of the 1964 Wilderness Act, the 1976 Federal Land Policy and Management Act, and BLM's Final Wilderness Management Policy of September 24, 1981. These Acts and management policy direct the administering agency to be responsible for preserving the wilderness character of the area. Section 4 of the 1964 Wilderness Act, which deals with use in wilderness areas, states that they shall be devoted to the public purposes of recreation, scenic, scientific, educational, conservation, and historical use.

ALTERNATIVES CONSIDERED

Since the pattern of future actions within the WSAs cannot be predicted with certainty, assumptions were made to allow the analysis of impacts under the various alternatives. These assumptions are the basis for impacts identified in this EIS. They are not to be considered as management plans or proposals, but rather as representing feasible patterns of activities which could occur under the alternatives considered.

Discussions of future management actions are restricted to mineral development and recreation. Management actions related to these two activities would change with the various alternatives. Although management directions exist for activities such as wildlife, fisheries, range and fire, as described below, these are not expected to change from one alternative to the next.

Wildlife management direction within the Gunnison Basin and American Flats Planning Unit calls for the allocation of sufficient forage for elk, deer and bighorn sheep. Since winter range is the constraining factor for these populations, assuring adequate forage is not a problem. Consequently, no special management actions that would be affected by wilderness designation are proposed. Similarily no projects or specific management actions are proposed for the fisheries resource that would be affected by wilderness designation.

Management of the range resources is directed toward optimizing livestock forage production on a sustained basis while improving the range condition and trend. Grazing in this area is restricted almost totally to sheep. As such no project developments are required and as a result range management direction would not be affected by wilderness designation.

Given the primitive nature of the resource in these WSAs fire management techniques are restricted to those that will minimize disturbance of the natural environment. These would not be expected to change significantly with designation.

With the exception of the Red Mountain alunite deposit, few site specific mineral evaluations have been conducted in any of the WSAs. The projected mineral developments identified in each of the alternatives are for the purposes of analysis only. These predictions are based

on the limited amount of information known. A favorable economic and technologic environment would have to exist before any actual development would occur.

In the Redcloud Peak, Handies Peak and American Flats WSAs, there is an extensive amount of existing mining claims, particularly in those areas with high potential for discovery. The validity of these claims is unknown at this time and would only be determined when a plan for development is submitted to BLM. However, it is assumed that given the large number of claims and the high potentials of the areas for discovery, that a certain number of these claims would ultimately be found to have valid existing rights. Except as specifically identified in the following discussions, these valid claims are predicted to be sufficient to allow for the same levels of mineral development with or without wilderness designation.

Within the Redcloud Peak WSA, alternatives address the development of an alunite deposit located in the eastern portion of the WSA on Red Mountain. Assumptions have been made regarding whether or not the deposit would be developed under each alternative. At this point there is no way of knowing if development will or will not take place. A discussion of the history of this development is necessary in order to understand the potential for any activity taking place.

Earth Science, Inc. applied for a preference right lease of 1,667 acres of public land for the purpose of developing a deposit of alunite (potassium aluminum sulfate). Authorization to prospect for leasable minerals is granted through the issuance of a prospecting permit. If a deposit of a valuable mineral is discovered as a result of prospecting, and if the land is chiefly valuable for that mineral, a lease shall be issued to the applicant. Earth Science, Inc. originally applied for a prospecting permit in 1970 and it was issued in 1974. Exploration drilling comprised of three drill holes varying in depth from 306 feet to 688 feet, was completed in 1978. In March of 1979, Earth Science, Inc. submitted the "Initial Showing" for a preference right lease application.

A condition in the prospecting permit issued to Earth Science stipulated that unless the deposit could be mined without significant adverse environmental effects, no lease would be issued.

During preparation of the environmental assessment to analyze impacts of the alunite proposal the Congress placed a prohibition on the processing of all leases within wilderness study areas. Consequently the EA and decision on whether or not to issue a lease has been put on hold. Therefore it has become necessary to speculate on the likelihood of development for the purposes of the analysis in this EIS.

Uncertainties related to the potential development of the alunite include making the decision discussed above; specifically whether it can be mined without significant adverse effects. If it is determined that it can be and a lease is issued, the company must also submit a "Final Showing" that documents that the alunite can be economically extracted. There is no indication at this time that this condition could be met.

If all the conditions in the leasing process are met there would be a valid existing right that would allow development even with wilderness designation.

Given the above there is no way to state with certainty that the deposit would or

would not be developed. For purposes of analysis, and in order to present both perspectives, it was decided that alternatives that recommended that portion of the WSA as suitable would not include alunite development. In those where the area was nonsuitable alunite development is projected.

Redcloud Peak (CO-030-208)

Proposed Action (Conflict Resolution Alternative I) - Under this alternative 30,400 acres would be recommended as suitable for wilderness designation including 720 acres outside the WSA boundary and previously cherry-stemmed from the southern side of the WSA (see Map 1-2). This boundary is delineated to exclude the Red Mountain alunite deposit. In addition, the eastern boundary of this alternative is drawn to exclude several potential transportation corridors for the extraction of ore (see Map 1-2). This alternative is the same as the Wilderness Manageability Alternative with the exception of the eastern boundary.

The proposed action represents a change from the DEIS in which Conflict Resolution Alternative II was the preferred alternative. Based on public comments, Conflict Resolution Alternative I would still allow for development of the Red Mountain alunite deposit while better protecting the wilderness resource.

Mineral Resource Development - Subject to valid existing rights, all lands within the 30,400 acres of the Red Cloud Peak WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

Within the suitable area, the Cooper and Silver Creek area may be developed for base and precious metals as a result of valid existing rights. Two small underground mines are projected on private land involving less than 5 acres of surface disturbance each and an underground mine developed on Federal land involving a total surface disturbance of 5 to 15 acres. If developed an additional 1 to 3 miles (2-5 acres) of new road construction per mine would be needed.

It is assumed under this alternative that the Red Mountain alunite deposit, located in the nonsuitable portion, would eventually be developed in a manner similar to the Earth Sciences proposal. The company proposes to extract the ore using a multiple branch surface mining method. Average daily production would be in the range of 12,500 tons of ore. Lower grade ore would be stockpiled in the upper East Fork, Alpine Gulch. The total surface disturbance after 100 years would be 425 acres which includes the mine and its service area. An additional 3 to 4 miles (5-7 acres) of new road construction would be needed. Also, outside the northern boundary in the nonsuitable portion there could be two underground mines involving a surface disturbance of 5 to 15 acres. Prospecting and exploration activities would continue outside the designated boundary for economic deposits of minerals. This would occur in the high potential area along the north and northeast edge of the WSA. Surface disturbance would occur on about 10 to 20 acres.

Recreation - The suitable acreage under this alternative would be managed to maintain a primitive backcountry recreation setting to provide opportunities for hiking, hunting, camping, photography, and mountain climbing. Recreational use would focus primarily on the Silver Creek trail which offers easy access to Redcloud and Sunshine Peaks, two of Colorado's 54 peaks over 14,000 feet. The Cooper Creek trail would also remain moderately popular with

hikers, hunters, and fishermen. Areas which would receive less recreation use include Bent Creek, Alpine Gulch, Owl Gulch, and Lee Smelter Gulch. An estimated 5000 Recreation User Days (RUDs) occur in the entire WSA. Most of that (probably 90 percent) occurs within the area recommended as suitable. This use is currently estimated to be increasing by about 5 percent annually. Wilderness designation of this area is expected to encourage an increase in the number of visitors by about 9 percent. This would result in increased efforts in visitor information and education, as well as regular trail maintenance for the Silver and Cooper Creek trails. No recreational vehicles are currently allowed in the area so no further closures would be necessary. The projected mineral development in Silver and Cooper Creeks would result in access roads being constructed into these areas. These would not be open to the public. An alternative hiking trail to Redcloud and Sunshine Peaks would be developed in Bent Creek.

The nonsuitable acreage under this alternative does not currently receive much recreation use. As much as possible this area would be managed to maintain a primitive backcountry recreation setting for hunting, fishing, hiking, photography, and nature study. The anticipated development of alunite deposits on Red Mountain would result in a recreation setting influenced by the sights and sounds of mining activity. The plans to develop hiking trails in Alpine Gulch would be abandoned. Roads resulting from this development would be evaluated to determine their suitability for recreation vehicles.

All Wilderness Alternative - This alternative would recommend the entire 40,575 acres of Redcloud Peak WSA as suitable for designation.

Mineral Resource Development - Subject to valid existing rights, all land within 40,575 acres of the Redcloud Peak WSA would be withdrawn from appropriation under the mining and mineral leasing laws. It is assumed that under the all wilderness alternative alunite would not be developed. In the Silver and Cooper Creek area, two private landowners have expressed a strong interest in developing a total of 3 mines on their private land. Assuming two of the three mines are successful, the surface disturbance would be limited to no more than 5 acres per mine with 1 to 3 miles (2-5 acres) of new road construction. The Federal land is heavily staked with mining claims throughout both basins. Due to the capital needed and the economics involved in developing a successful mining operation, most claimants with valid existing rights would probably sell their claim to a consolidated interest. This interest could develop an underground mine in the area involving surface disturbance of 5 to 15 acres and 1 to 3 miles (2-5 acres) of road construction. Two small underground mines with a surface disturbance of 5 to 15 acres may also be developed along the northern boundary of the WSA.

No further exploration for economic deposits of minerals would occur on other than those claims with valid existing rights.

Recreation - Under this alternative the entire area would be managed to maintain a primitive backcountry recreation setting for hikers, hunters, fishermen, photographers, and mountain climbers. Current recreation use is estimated to be 5000 RUDs. The anticipated increase of 9 percent in the number of recreationists in the area would require increased efforts in visitor information and education. The Silver and Cooper Creek trails would be periodically maintained and toilet facilities would be placed at the Silver Creek trailhead. Approximately 5 miles (3 acres) of trail would be developed in

Alpine Gulch to spread out visitor use and to take advantage of the unused recreation potential of that area. Recreation vehicles are not currently permitted and no additional closures would be necessary.

The expected mineral development on the northern boundary of the area would not change recreation management. The development anticipated for Silver and Cooper Creeks would result in access roads being developed into this area. Roads resulting from this development would not be open to recreational vehicles. An alternate trail to Redcloud and Sunshine Peaks could be developed via Bent Creek.

No Wilderness Alternative (No Action)-The entire Redcloud Peak WSA would be recommended as nonsuitable for wilderness designation.

Mineral Resource Development - All land within this study area would remain open to appropriation under the mining and mineral leasing laws. Presently there are over 900 mining claims in the WSA.

It is assumed under this alternative that the Red Mountain alunite deposit would eventually be developed. The total surface disturbance after 100 years would be 425 acres which includes the mine and its service area. An additional 3 to 4 miles (5-7 acres) would be needed for new road construction.

The Cooper and Silver Creek area is likely to be developed for base and precious minerals. There would be two small underground mines on private land involving less than 5 acres of surface disturbance each and an underground mine developed on Federal land involving a total surface disturbance of 5 to 15 acres. An additional 1 to 3 miles (2-5 acres) of new road construction per mine would be needed. The northern boundary would also have two underground mines involving a surface disturbance of 5 to 15 acres. Prospecting and exploration for economic deposits of minerals would continue in those areas with high mineral potential. These activities, which would involve small excavations, minor road work and small drill pad cuts, would disturb about 35-70 acres.

Recreation - If no acreage is designated wilderness, the recreation goals for the area would be to maintain a primitive backcountry setting. This would provide opportunities for mountain climbing, hunting, fishing, hiking, photography, and nature study. The area is currently closed to recreation vehicles so no further closures would be necessary. Mineral development in the Silver and Cooper Creek drainages would result in access roads being developed into this area. An alternative trail to Redcloud and Sunshine Peaks would be developed up Bent Creek. Expected development of the alunite deposits on Red Mountain would result in the recreation setting in this area being influenced by the sights and sounds of mining activity. Any roads resulting from these developments would be evaluated to determine their suitability for recreation use. The current estimated recreation use of 5000 RUDs would increase at an estimated 5 percent annually.

Wilderness Manageability Alternative-Under this alternative 37,530 acres would be recommended as suitable for wilderness designation (see Map 1-2). This alternative reduces the wilderness area to a unit which contains most of the wilderness values within the WSA while excluding some peripheral patented lands south of Henson Creek and north of the Lake Fork of the Gunnison River. The boundary on the north primarily follows a legal subdivision; on the east parallels either the WSA boundary or topographic features; on the south parallels the WSA boundary, follows a legal subdivision south of

Sunshine Peak, and parallels the road right-of-way; and on the west parallels the WSA boundary which is a topographic feature. The wilderness part of this alternative includes extensive deer, elk, and bighorn sheep habitat, as well as numerous canyons, ridges, and peaks of the Redcloud Peak unit.

Mineral Resource Development - Subject to valid existing rights, all land within 37,530 acres of the Redcloud WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

It is assumed that under the Manageability Alternative alunite would not be developed. In the Silver and Cooper Creek area, two private landowners have expressed a strong interest in developing a total of 3 mines on their private land. Assuming two of the three mines are successful, the surface disturbance would be limited to no more than 5 acres per mine. The Federal land is heavily staked with mining claims throughout the Silver and Cooper Creek areas. Due to the capital needed and the economics involved in developing a successful mining operation, most claimants with valid existing rights would probably sell their claim to a consolidated interest. This interest would develop an underground mine in the area involving a surface disturbance of 5 to 15 acres. Each of these mines would require 1 to 3 miles (2-5 acres) of road construction.

Two small underground mines with a surface disturbance of 5 to 15 acres would also be developed outside the northern boundary of the suitable area. There is no mineral development anticipated on the remaining nonsuitable acreage. Wilderness designation would preclude further exploration for economic deposits of minerals other than those claims with valid existing rights within its boundaries.

Recreation - In this alternative all suitable acreage would be managed to maintain a primitive backcountry setting to provide opportunities for hiking, hunting, fishing, photography, and mountain climbing. Approximately 95 percent of the estimated current 5000 RUDs occur in this portion of the WSA. The anticipated 9 percent increase in number of recreationists would require increased efforts in visitor information and education. The Silver and Cooper Creek trails, which now receive the majority of use, would be periodically maintained and toilet facilities would be placed at the Silver Creek trailhead. Additional trails would be developed in Alpine Gulch to spread out visitor use and to take advantage of the unused recreation potential of that area. Recreation vehicles are not currently permitted in this area and no additional closures would be necessary.

The mineral development for the Silver and Cooper Creek drainages would result in access roads being developed into these areas. Roads resulting from this development would not be open to recreational vehicles. An alternative trail to Redcloud and Sunshine Peaks could be developed via Bent Creek.

Nonsuitable acreage under this alternative would be managed to maintain a primitive backcountry setting. Some mineral development is anticipated along the northern boundary but very little recreation use occurs here and no management actions are necessary. This area is currently closed to recreation vehicles and no further closures are necessary.

Conflict Resolution Alternative II - Under this alternative 11,140 acres would be recommended as suitable for wilderness designation (see Map 1-2). The northern

boundary would follow a ridge line which encloses Cooper Creek and Silver Creek. The eastern boundary would parallel the WSA boundary. The southern boundary would be the same as described in the Wilderness Manageability Alternative, and the western boundary would be the western ridge above Cooper Creek. The wilderness part of this alternative would include both Sunshine and Redcloud Peaks, and the primary canyons and drainages associated with these peaks. This alternative would enhance the wilderness manageability alternatives for the adjacent Handies Peak area by protecting its viewshed, would exclude the alunite deposit on Red Mountain, and would exclude some other areas of high potential mineral resources. In the DEIS, this was the preferred alternative (see Conflict Resolution Alternative I).

Mineral Resource Development - Subject to valid existing rights, all lands within 11,140 acres of the Red Cloud Peak WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws. The Cooper and Silver Creek area is likely to be developed for base and precious minerals. There would be two small underground mines on private land involving less than 5 acres of surface disturbance each and an underground mine developed on Federal land involving a total surface disturbance of 5 to 15 acres. An additional 1 to 3 miles (2-5 acres) of new road construction per mine would be needed.

It is assumed under this alternative that the Red Mountain alunite deposit in the nonsuitable portion would be developed. The total surface disturbance after 100 years would be 425 acres which includes the mine and its service area. An additional 3 to 4 miles (5-7 acres) would be needed for new road construction. Also, outside the suitable area boundary between Capital City and Lake City there would be two underground mines involving a surface disturbance of 5 to 15 acres. Prospecting and exploration activities would continue outside the suitable area boundary for economic deposits of minerals. These would be primarily in the high potential area along the northern and northeastern edge of the WSA. Surface disturbance, involving minor roadcuts and small excavation, would occur on about 5-10 acres.

Recreation - The suitable acreage under this alternative would be managed to maintain a primitive backcountry recreation setting to provide opportunities for mountain climbing, hunting, fishing, hiking, and photography. Approximately 50 percent of the current estimated 5000 RUDs occur within the suitable area. Use would continue to center primarily around the Silver Creek trail which provides relatively easy access to two peaks over 14,000 feet.

The adjacent Cooper Creek trail would get moderate use by hikers and fishermen. In the fall, the Bent Creek drainage would be used by hunters.

Anticipating a 9 percent increase in the use of this area, it is expected that more effort will be put into visitor information and education. The trails up Silver and Cooper Creeks would be periodically maintained. A toilet facility would be placed in Burrows Park at the Silver Creek trailhead.

Anticipated mineral development in the Silver and Cooper Creek drainages would result in access roads being developed into these areas. Any roads resulting from mineral development would remain closed to recreation vehicles. An alternative trail to Redcloud and Sunshine peaks could be developed up Bent Creek. The area is currently closed to recreation vehicles so no additional closures would be necessary.

The nonsuitable acreage under this

alternative would be managed to maintain a primitive backcountry setting to provide opportunities for hiking, hunting, fishing, and photography. No recreation vehicles are currently permitted in the area so no further closures would be necessary. Expected mineral development in the northern portion of the WSA would not alter recreation actions for that area. The anticipated development of the Red Mountain alunite deposit would result in the recreation setting in this area being dominated by the sights and sounds of the mining activity. Roads resulting from this development would be evaluated to determine their suitability for recreation vehicles.

Handies Peak (CO-030-241)

Proposed Action (Conflict Resolution Alternative) - Under this alternative 7,885 acres would be recommended as suitable for wilderness designation (see Map 1-2). This is the same as the DEIS Conflict Resolution Alternative except the eastern boundary now excludes the private lands near Campbell Creek that are subject to mineral development and the northern boundary now includes the north face of Whitecross Mountain.

Mineral Resource Development - Subject to valid existing rights, all lands within Handies Peak WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

Handies Peak is geologically similar and adjacent to a highly productive area of the Eureka Mining District. For the purposes of analysis, it was assumed that similar vein deposits occur in the Handies Peak WSA. Although no site specific mineral investigation has been done in this area, the information indicates a high potential for the location of base and precious minerals, uranium and indications of the critical and strategic minerals cobalt, nickel, and molybdenum in the western half of the WSA. Presently, there are approximately 200 mining claims located primarily in the western and northwestern portion of the WSA.

For the purpose of analysis, it is assumed that one to three significant underground mines would be developed in the Lake Fork drainage area within the suitable area. The larger of the significant mining operations would involve a total of 50 acres of surface disturbance and the other two would involve no more than 25 acres each. New road construction would involve a maximum length of 3 miles (5 acres) per mine.

The remaining nonsuitable acreage would remain open to mineral development under the mining and mineral leasing laws. There could be further exploratory work in the nonsuitable area in the southwest portion of the WSA for base and precious minerals and molybdenum. This would likely disturb 10 to 20 acres as a result of small excavations, drill pads and road construction.

Development is anticipated in the nonsuitable area in the southeastern portion of the WSA opposite the Shelf Road for base and precious minerals. The mine would disturb no more than 15 surface acres.

Recreation - The 7,885 acres recommended as suitable include the areas of highest recreation use. Recreation use would continue to center around the ascent of Handies Peak (14,048 feet) from the northeast via Grizzly Gulch, from the southwest via Sloan Lake and to a lesser extent from the southeast via Boulder Gulch. The Grizzly Gulch, Sloan Lake and American Basin areas also attract recreationists on their own merits. This area would continue to be managed to provide opportunities for hiking, nature study, mountain climbing, photography, and

fishing in a primitive backcountry recreation setting. Current use is estimated to be 4000 RUDs for the entire WSA. Of that about 75 percent occurs within the suitable area. This use is increasing at an estimated rate of about 5 percent annually. Based on an anticipated increase in visitor use after designation, more effort would be put into periodic trail maintenance, as well as visitor information and education. Recreational vehicle use is not permitted in the area and no additional closures will be necessary. The expected development of mineral resources, particularly in American Basin, would result in the management of this area being directed toward providing a continuation of existing activities except in a setting that would be affected by motorized use.

The nonsuitable portion of this WSA would be managed to maintain a primitive backcountry setting for hikers, hunters, fishermen, and photographers. In the areas of Snare Creek, Cuba Gulch, and Campbell Creek the expected mineral development would alter the setting to one influenced by motorized use. The recreation use will continue to center around the Cataract Gulch and Cuba Gulch trails which are used by hikers and hunters. These trails would be periodically maintained. The majority of the nonsuitable portion is too steep to allow recreational vehicle use. The area is currently closed to vehicles and no additional closures would be necessary. Roads that result from mineral development would be reevaluated to determine their suitability for vehicle oriented recreation.

All Wilderness Alternative - The entire 18,860 acre Handies Peak WSA would be recommended as suitable for wilderness designation.

Mineral Resource Development - Subject to valid existing rights, all lands within the 18,860 acres of the Handies Peak WSA would be withdrawn from appropriation under the mining and mineral leasing laws.

Presently, there are approximately 200 mining claims with the majority concentrated in the western half of the WSA. Handies Peak is geologically similar to an adjacent highly productive area of the Eureka Mining District. For the purposes of analysis, it was assumed that similar vein deposits also occur in Handies Peak. The information known about this WSA does indicate a high mineral potential in the western section for the location of base and precious metals, uranium, and two of the critical and strategic minerals, cobalt and nickel (See Appendix 3.8).

For the purpose of analysis, one to three significant underground mines would be developed in the Lake Fork drainage area. The larger of the significant mining operations would involve a total of 50 acres of surface disturbance and the other two would involve no more than 25 acres each. New road construction would involve a maximum length of 3 miles (5 acres) per mine. Development is anticipated on private land west of the Shelf Road in the eastern portion of the WSA for base and precious minerals. The mine would disturb from 5 to 15 surface acres. No exploration activities would take place.

Recreation - Recreation management for this area, as outlined in the Recreation Area Management Plan, calls for the maintenance of a primitive backcountry recreational setting to provide opportunities for mountain climbing, nature study, hunting, fishing, photography, and hiking. The current 4000 RUDs in the Handies Peak wilderness is expected to increase by 9 percent annually and more effort would be put into periodic trail maintenance, trailhead signing, and visitor information and education. The area is currently closed to recreational vehicles and no additional closures would be necessary.

Expected mineral development in areas of high potential would result in roads being developed into this area. These would not be open to recreational vehicle use.

No Wilderness Alternative (No Action)-The entire Handies Peak WSA would be recommended as nonsuitable for wilderness designation.

Mineral Resource Development - All land within this study area would remain open to appropriation under the mining and mineral leasing laws. Presently, there are approximately 200 mining claims with the majority concentrated in the western half of the WSA.

Handies Peak is geologically similar to an adjacent highly productive area of the Eureka Mining District. For the purposes of analysis, it was assumed that similar vein deposits also occur in Handies Peak. The information known about this WSA does indicate a high mineral potential in the western section for the location of base and precious metals, uranium and two of the critical and strategic minerals, cobalt and nickel (See Appendix 3.8).

For the purpose of analysis it is assumed that one to three significant underground mines will be developed in the Lake Fork drainage area. The larger of the significant mining operations would involve a total of 50 acres and the other two would involve no more than 25 acres each. New road construction would involve a maximum length of 3 miles (5 acres) per mine. Development is also anticipated on private land west of the Shelf Road in the eastern edge of the WSA for base and precious minerals. The mine would disturb 5 to 15 surface acres.

Since the area would remain open to mineral entry, it is anticipated that there would be a continuation of new claims being staked in the WSA. It has been reported to BLM that exploration in the Snare Creek area has resulted in a possible ore body being discovered on private land. If developed, it could result in the Federal land adjacent to it being developed also.

Continued exploration activity in the form of small excavations, road construction, and drill pad construction would disturb approximately 20 to 40 acres primarily in the western half of the WSA.

Recreation - Under this alternative the area would be managed to maintain the primitive backcountry character to provide opportunities for hunting, fishing, hiking, photography, and mountain climbing. The expected mineral development in American Basin and Campbell Creek could result in roads being developed into this area. No recreational vehicle use is currently permitted in the area so no further closures would be necessary. Roads that result from mineral development would be evaluated to determine their suitability for vehicle oriented recreation. Efforts would be made to periodically maintain the Grizzly Gulch, Sloan Lake, Boulder Gulch, Cuba Gulch and Cataract Gulch trails. The estimated current use of 4,000 RUDs would increase by about 5 percent annually.

Wilderness Manageability Alternative Under this alternative 8,220 acres would be recommended as suitable for wilderness designation (see Map 1-2). The boundaries are delineated along topographic features or to exclude mineral development southwest of the WSA. This proposal would also include the upper end of the vehicle way in American Basin. The boundary would parallel the Lake Fork of the Gunnison River on the north and to the east, and would parallel the Cottonwood Creek Road on the south. The boundary follows a ridge line south of Boulder Gulch and the ridge enclosing Sloan Lake and American Basin. This alternative concentrates designation around Handies Peak and the surrounding

glacial valleys including Boulder Gulch, Campbell Creek, Grizzly Gulch, and the head of American Basin. This would exclude the areas around Jones Mountain-Snare Basin and south of Cottonwood Creek. The Cottonwood Creek Road and mineral activity nears Jones Mountain-Snare Basin physically separates this area from the Handies Peak portion of the WSA.

Mineral Resource Development - Subject to valid existing rights, all lands within the 8,220 acres of the Handies Peak WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

Handies Peak is geologically similar and adjacent to a highly productive area of the Eureka Mining District. For the purposes of any analysis, it was assumed that similar vein deposits also occur in the Handies Peak WSA. Although no site specific mineral investigation has been done in this area, the information indicates a high potential for the location of base and precious minerals, uranium, and indications of the critical and strategic minerals cobalt, nickel, and molybdenum in the western half of the WSA. Presently there are approximately 200 mining claims. The Lake Fork area is heavily staked and private land is scattered throughout this basin. Due to the capital needed and economics involved in developing successful mining operation, most claimants with valid existing rights would probably sell their claim to one or two consolidated interests. For the purpose of analysis, one to three significant underground mines would be developed in the Lake Fork drainage areas. The larger of the significant mining operation would involve a total of 50 acres of surface disturbance and the other two would involve no more than 25 acres each. New road construction would be built with a maximum length of 3 miles (5 acres) per mine. Development is also anticipated on private land west of the Shelf Road in the eastern edge of the WSA for base and precious minerals. The mine would disturb 5 to 15 surface acres.

The nonsuitable acreage would remain open to mineral development under the mining and mineral leasing laws. There would be further exploratory work outside of this alternative's southwest boundary for base and precious minerals and molybdenum. This would disturb about 10-20 acres.

Recreation - Suitable portions of the area would be managed to provide a primitive backcountry setting for mountain climbing, hunting, fishing, nature study, hiking, and photography. Recreation activity would center around the main trails up to Handies Peak (14,048 feet) in Grizzly Gulch and American Basin via Sloan Lake. These trailheads would be clearly marked and the trails periodically maintained. Approximately 75 percent of the 4000 RUDs occurring in the WSA are within the suitable area. Based upon studies showing regular yearly increase of about 9 percent in the use of wilderness, more effort would be put into visitor information and education. Recreational vehicle use is not permitted at this time and no additional closures would be necessary. The expected development of mineral resources in American Basin and near Campbell Creek would result in some motorized use associated with that use. These areas would not be open to motorized recreation use. Projected mineral development in the Campbell Creek area would also change the setting to one influenced by motorized use but this portion receives very little recreational use.

The nonsuitable portion of the WSA would be managed to maintain a primitive backcountry setting for hikers, hunters, fishermen, and photographers. Recreation use would continue to be centered around the Cataract Gulch and Cuba Gulch trails, which are used by hikers and hunters. The area is

currently closed to recreation vehicles and no additional closures would be needed.

American Flats (CO-030-217)

Proposed Action (Conflict Resolution Alternative) - Under this alternative 1,505 acres would be recommended as suitable for wilderness designation (see Map 1-2). This alternative is an extension of the existing Big Blue Wilderness Area, but deletes all State-owned minerals, highpotential mineral resource areas, and the majority of old vehicle ways within the WSA. The western and northern boundaries of the area are the present Big Blue Wilderness boundaries. The southern boundary essentially parallels the Ouray-Hinsdale County line and a ridge line above Bear Creek to the southwest. These lands primarily include drainages flowing toward the Big Blue Wilderness Area. An exception is American Lake which flows into Henson Creek.

Mineral Resource Development - Subject to valid existing rights, all lands within the 1,505 acre portion recommended for designation would be withdrawn from appropriation under the mining and mineral leasing laws. Since this area is considered low in mineral potential, no mineral development is anticipated on any existing claims.

The remaining nonsuitable acreage has a moderate to high mineral potential. Due to the capital needed and economics involved in developing a successful mining operation, claimants with valid existing rights would probably sell their claim to a consolidated interest. This consolidated interest would develop a medium underground operation in a high mineral potential area involving a disturbance of up to 5 acres for surface activities. An additional 10 acres would be needed for a waste dump and a maximum length of 5 miles (8 acres) for new road construction to the mine. The minerals mined would most likely be a combination of precious metal, associated base minerals, and uranium. This would include, but is not limited to, gold, silver, copper, zinc, molybdenum, and lead. Exploration activity would disturb about 10 to 15 acres within the eastern edge of the nonsuitable area. This would result from minor excavations and road construction.

The 10 mineral acres administered by the State of Colorado are located in the nonsuitable acreage. If development of these acreages should occur, no disturbance is anticipated, since it is expected to be underground mining and the portals would be located outside the WSA.

Recreation - The 1,505 acres recommended as suitable for wilderness would be managed as an extension of the adjacent Forest Service Big Blue Wilderness. The area would continue to be used, as it is now, by hikers and hunters in a primitive backcountry setting. Recreational vehicle use is not permitted in the area, and no further closures would be necessary. Approximately 80 percent of the current estimated use of 1500 RUDs occurs within the suitable area. With designation this is expected to increase by about 9 percent annually.

The nonsuitable portion of the area would be managed to maintain a primitive backcountry setting for hiking, hunting, nature study, and photography. Some mineral development is expected in areas of high mineral potential. Access routes would be placed to minimize visual and resource impacts. The area would remain closed to recreation vehicles.

All Wilderness Alternative - The entire 4,710 acres of American Flats WSA would be recommended as suitable for wilderness designation.

Mineral Resource Development - Subject to valid existing rights, all land within these boundaries would be withdrawn from appropriation under the mining and mineral leasing laws. Presently, there are 44 mining claims scattered throughout this WSA.

Due to the capital needed and economics involved in developing a successful mining operation, claimants with valid existing rights would probably sell their claim to a consolidated interest. This consolidated interest would develop a medium underground operation in the high mineral potential area involving a disturbance of up to 5 acres for surface activities. An additional 10 acres would be used as a waste dump for the mine and a maximum length of 5 miles (8 acres) for new road construction to the mine. The minerals mined would most likely be a combination of precious and associated base minerals and uranium. No exploration activity would be allowed.

There are 10 acres within this WSA boundary owned by the State of Colorado. If development should occur, no surface disturbance is anticipated, since it is expected to be underground mining and the portals would be located on non-Federal surface outside the WSA.

Recreation - Recreation management for this area would be coordinated with the management of the adjacent Forest Service Big Blue Wilderness. This would provide opportunities for hiking, hunting, nature study, camping, and photography in a primitive backcountry setting. No recreational vehicle use is currently permitted so no additional closures will be necessary. The current use of 1500 RUDs would be expected to increase by about 9 percent annually.

Projected mineral development in the area of high mineral potential will change the recreation setting to one influenced by motorized use but the area will remain closed to recreation vehicles.

No Wilderness Alternative (No Action)

The entire American Flats WSA would be recommended nonsuitable for designation as wilderness.

Mineral Resource Development - All land within this study area would remain open to appropriation under the mining and mineral leasing laws. Presently, there are 44 mining claims scattered throughout this WSA. Mining development would be located in the high mineral potential area. Claimants with valid existing rights are predicted to sell their claim to a consolidated interest that could develop a small underground mine involving surface operations that would disturb up to 5 acres. An additional 10 acres could be needed for a waste dump and up to an additional 5 miles (8 acres) of new road construction would take place. The minerals mined would most likely be a combination of precious metals, associated base minerals, and uranium. This would include, but not be limited to, gold, silver, copper, zinc, molybdenum, and lead. Since the area will remain open to mineral entry, it is anticipated that there would be a continuation of new claims being staked in the high mineral potential areas of the WSA. Approximately 10-20 acres would be disturbed as a result of exploration activity in these high potential areas.

The 10 mineral acres administered by the State of Colorado are located in the nonsuitable acreage. If development of this acreage should occur, no disturbance is anticipated since it is expected to be underground mining and the portals would be located outside the WSA.

Recreation - In the absence of wilderness

designation, the recreation management plan for the area calls for the maintenance of a primitive backcountry recreation setting. This would provide continuing opportunities for hiking, hunting, backpacking, nature study, and photography. No recreation vehicle use is currently permitted, so no additional closures would be necessary. Development occurring in area of high mineral potential would alter the recreation setting. The area would remain closed to recreational vehicles. The current estimated 1500 RUDs would increase by about 5 percent annually.

Bill Hare Gulch (CO-030-085)

Proposed Action (No Wilderness) - The entire 370 acres of Bill Hare Gulch WSA would not be recommended as suitable for wilderness designation.

Mineral Resource Development - All land within this study area would remain open to appropriation under the mining and leasing laws. All of the WSA is considered low in mineral potential and no development or exploration is anticipated.

Recreation - The area will continue to be managed for a backcountry recreational setting under this alternative. The primitive foot/horse trail which passes through the study area and provides access to the Forest Service Big Blue Wilderness will remain open. No recreational vehicle access is proposed.

The primary recreation use would continue to be hikers and hunters passing through this area to reach the Big Blue. Use will likely increase from the current 50 RUDs to about another 50 RUDs and then remain consistent.

All Wilderness Alternative - The entire 370 acres of Bill Hare Gulch WSA would be recommended as suitable for wilderness designation.

Mineral Resource Development - Subject to valid existing rights, all lands within Bill Hare Gulch WSA would be withdrawn from appropriation under the mining and mineral leasing laws.

There are no State or private mineral acres within this alternative. The entire WSA is considered low in mineral potential and no development is expected.

Recreation - The study area, if designated wilderness, would continue to be managed to provide a primitive backcountry recreational setting. The primitive foot/horse trail which passes through the study area and provides access to the Forest Service Big Blue Wilderness would remain open. No vehicle access is presently allowed in the study area so no vehicle closures would be necessary. The primary recreation use would continue to be hikers and hunters passing through this area to reach the Big Blue. Recreation use will probably double due to the availability of the new trail and then remain fairly consistent.

Wilderness Manageability Alternative- Under this alternative 325 acres would be recommended as suitable for wilderness designation (see Map 1-2). The western border of the WSA is the Big Blue Wilderness Area. The only portion of the WSA which would be excluded would be the 45 acres north of Bill Hare Gulch which is surrounded on three sides by private land.

Mineral Resource Development - Subject to valid existing rights, all lands within 325 acres of the Bill Hare Gulch WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

There are no State or private mineral acres within the WSA. Both the suitable and nonsuitable acreage are considered low in mineral potential and no development or

exploration is expected.

Recreation - The area would continue to be managed to provide a primitive backcountry recreational setting. The primitive foot/horse trail which passes through the study area and provides access to the Forest Service Big Blue Wilderness would remain open. No vehicle access is presently allowed in the study area so no vehicle closures would be necessary. The primary recreation use would continue to be hikers and hunters passing through this area to reach the Big Blue. Recreation use will likely double and then remain fairly consistent over time.

Larson Creek (CO-030-086)

Proposed Action (No Wilderness Alternative - The entire 900 acres of Larson Creek WSA would not be recommended as suitable for wilderness designation.

Mineral Resource Development - All land within this area would remain open to appropriation under the mining and leasing laws. All of the WSA is considered low in mineral potential and no exploration or development is anticipated.

Recreation - In the absence of wilderness designation, this area would continue to be managed for a primitive backcountry recreational setting. No recreation vehicle access is proposed. Little change is expected in the current 20 RUDs of use.

All Wilderness Alternative - The entire 900 acres of Larson Creek WSA would be recommended for wilderness designation.

Mineral Resource Development - Subject to valid existing rights, all lands within 900 acres of the Larson Creek WSA would be withdrawn from appropriation under the mining and mineral leasing laws.

There are no State or private mineral acres within this WSA. All of the WSA is considered low in mineral potential and no development is expected.

Recreation - If designated as wilderness, this area would continue to be managed for a primitive backcountry recreation setting. Current recreation use is very low. No recreation vehicle access is presently allowed so no vehicle closures would be necessary. Little change is expected in the current 20 RUDs of use.

Wilderness Manageability Alternative - Under this alternative 480 acres contiguous to the Big Blue Wilderness Area would be recommended for wilderness designation (see Map 1-2). The northern and western boundary is the Big Blue Wilderness Area. The eastern boundary is a continuation of the boundary of the wilderness area. The southern boundary is a legal subdivision line which parallels the current wilderness area boundary. This alternative would exclude an old vehicle way and abandoned cabins within the WSA.

Mineral Resource Development - Subject to valid existing rights, all lands within 480 acres of the Larson Creek WSA recommended as suitable would be withdrawn from appropriation under the mining and mineral leasing laws.

There are no State or private mineral acres within the area recommended as suitable designation. Both the suitable and nonsuitable acreage are considered low in mineral potential and no exploration or development is expected.

Recreation - If this option is adopted the study would continue to be managed for a primitive backcountry recreational setting. No recreation vehicle access is presently allowed so no vehicle closures would be necessary. No change in use is expected.

Summary/Comparison of Alternatives

An impact summary and comparison of the alternatives is presented in Table 2-1. For additional detail on impacts, see Chapter 4, Environmental Consequences.

Table 2-1
Comparison of Impacts
Redcloud Peak

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Wilderness Values	Although a total of 30,400 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 28,400. In addition, wilderness values would eventually be lost on 10,175 acres recommended as nonsuitable as a result of alunite mining and other small mineral operations.	Although a total of 40,575 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could affect 3,000 acres and reduce the acreage on which wilderness values are actually preserved to 37,575.	Approximately 520 to 585 acres would be disturbed from various mineral actities. Wilderness values would be directly lost on about 11,000 acres as a result of these activities. In the long term wilderness values would be lost on the entire 40,575 acres.	Although a total of 37,500 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could affect 2,000 acres and reduce the acreage on which wilderness values are actually preserved to 35,530. Wilderness values would also be lost on the 3,045 acres recommended nonsuitable.	Although 11,140 acres would be designated and protected as wilderness, potential development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 9,140. In addition wilderness values would be lost on about 9,000 acres in the nonsuitable portion of the WSA as a result of alunite mining and other small mineral operations. In the long term wilderness values would be lost on the 29,435 acres recommended nonsuitable.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Mineral Resource Development	The proposed action would withdraw 30,400 acres from mineral entry, subject to valid existing rights. Due to predicted valid existing rights development of three mines for the production of base and precious metals in the Silver and Cooper Creek drainages would still occur. The 10,175 acres recommended as nonsuitable would remain open to mineral entry. Production of 4 million tons of alunite as well as an unquantified amount of base and precious metals from two mines would occur. Alunite would generate 110 jobs and increase per capita income by nineteen percent.	Subject to valid existing rights 40,575 acres would be withdrawn from mineral entry and the mineral potential would be foregone. Surface disturbing exploration activity would be foregone. Development of 4 million tons of alunite ore annually would not occur. The projected resultant 110 jobs and nineteen percent increase in per capita income would also not occur. Five small underground mines for the production of base and precious metals would result from valid existing rights.	The entire 40,575 WSA would remain open to mineral entry with development of base and precious metals predicted to result from 5 small mines. If developed, the alunite mine on Red Mountain would produce 4 million tons of ore annually, generate 110 jobs and increase per capita income nineteen percent.	Subject to valid existing rights mineral development would be foregone on 37,530 acres recommended as suitable. Valid existing rights would allow development of three mines in Silver and Cooper Creeks. Two small mines and mineral exploration would be allowed on the 3,045 recommended nonsuitable. Development of 4 million tons of alunite would not occur. The projected resultant 110 jobs and nineteen percent increase in per capita income would also not occur.	The proposed action would withdraw 11,140 acres from mineral entry, subject to valid existing rights. Due to predicted valid existing rights development of three mines for the production of base and precious metals in the Silver and Cooper Creek drainages would still occur. The 29,435 acres recommended as nonsuitable would remain open to mineral entry. Production of 4 million tons of alunite as well as an unquantified amount of base and precious metals from two mines would occur. Alunite development would generate 110 jobs and increase per capita income by nineteen percent.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Recreation Use	The existing 4,500 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur within the suitable areas. This use would increase by about 9 percent annually. The current 500 RUDs of use in the nonsuitable portion would increase by about 5 percent annually and shift toward motorized recreation.	The existing 5,000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur. This use would increase by about 9 percent annually. Access to Redcloud and Sunshine Peaks would shift from Silver Creek to Bent Creek. New trails would provide better dispersion of recreationists in the Alpine Gulch area.	The existing 5,000 RUDs would increase by about 5 percent annually. Existing activities would occur in a setting dominated by manmade intrusions. An additional 1,250 RUDs of motorized recreation use would occur on new mining roads.	The existing 4,750 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur within the suitable area. This use would increase by about 9 percent annually. The 250 RUDs of use in the nonsuitable portion would increase by about 5 percent annually with little change in the types of activities taking place.	The existing 2,500 RUDs of hiking, hunting, camping, photography and mountain climbing would continue to occur within the suitable area. This use is expected to increase by about 9 percent annually. The current 2,500 RUDs of use in the nonsuitable portion would increase by about 5 percent annually and shift toward motorized recreation in the Alpine Gulch area.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Soils	Within the suitable area soil would be disturbed and productivity lost on approximately 20 to 40 acres as a result of mineral development and trail construction. Disturbance of 25 to 50 acres from prospecting activity would be prevented. Soil would be disturbed and productivity lost on up to 495 acres from alunite and other development in the area recommended non suitable. Overall 515 to 535 acres would be disturbed.	Disturbance and loss of productivity would occur on about 25 to 55 acres of soil from mineral development, access road construction and trail construction would occur. Designation would preclude disturbance to 35 to 70 acres from exploration activity and 460 acres from alunite development. Overall 25 to 55 acres would be disturbed.	Soil disturbance would occur and productivity would be lost on 520 to 585 acres as a result of predicted mineral activity.	Disturbance and loss of productivity would occur on 20 to 40 acres of soil from mineral development, access road construction and trail construction within the suitable area. Disturbance to 490 to 520 acres would be prevented. About 10 to 30 acres would be disturbed within the nonsuitable area. Overall 30 to 70 acres would be disturbed.	Within the suitable area soil would be disturbed and productivity would be lost on approximately 20 to 40 acres as a result of mineral development and trail construction. Disturbance of 10 to 20 acres from prospecting would be prevented. Soil would be disturbed on 460 acres from alunite and other mineral development in the area recommended nonsuitable. An additional 30 to 60 acres would be disturbed as a result of other mineral development and prospecting. Overall 500 to 560 acres would be disturbed.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Water Quality	Degradation of water quality would occur in both the suitable and nonsuitable portions of the WSA. These would be concentrated in the Cooper and Silver Creek areas within the suitable portion. Alpine Gulch, East Alpine Gulch, Red Mountain Gulch, Wade Gulch and Henson Creek would be affected if alunite is developed in the non-suitable portion of the WSA. Overall about 14 miles of stream would be affected.	Water quality would be degraded by mineral development in Silver and Cooper Creeks and along Henson Creek. Impacts to water quality associated with alunite development would not occur. About 5 miles of stream would be affected.	Mineral development in the Red Mountain area, Cooper and Silver Creeks and along the northern boundary as well as continued exploration would result in contam-ination of up to 14 miles of stream with sediment and heavy metals. This would be significant only in the case of Red Mountain development activity.	Water quality in 5 miles of stream within the suitable area would be affected by mineral development in Silver and Cooper Creeks. Impacts to water quality associated with alunite development would not occur. Slight impacts to Henson Creek might result from two mines in the nonsuitable area.	Degradation of water quality would occur in both the suitable and nonsuitable portions of the WSA. These would be concentrated in the Cooper and Silver Creek areas within the suitable portion. Alpine Gulch, East Alpine Gulch, Red Mountain Gulch, Wade Gulch and Henson Creek would be affected as a result of alunite development in the non-suitable portion of the WSA. Overall, about 14 miles of stream could be affected.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY	CONFLICT RESOLUTION II
Wildlife	Development of the alunite deposit would displace 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Aquatic habitats in Alpine and East Alpine Gulch would be subject to degradation. Bighorn sheep, deer and elk habitat would be protected on the 30,400 acres recommended suitable.	Impacts to terrestrial and aquatic, wildlife from alunite development would not occur in this alternative. Overall impact would be the long term protection to 40,575 acres of habitat and about 200 elk, 120 deer and 20 bighorn sheep.	Development of alunite would result in displacing 50 to 80 deer and 100 to 130 elk to other portions of their summer range and degradation of water quality and loss of aquatic habitat in Alpine and East Alpine Gulch.	Impacts to terrestrial and aquatic habitat from alunite development would not occur. The overall impact would be the long term protection of 37,530 acres of habitat and about 200 elk, 120 deer and 20 bighorn sheep.	Development of the alunite deposit would displace 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Aquatic habitat in Alpine and East Alpine Gulch would be degraded. Bighorn sheep, elk and deer habitat would be protected on 11,140 acres.

Table 2-2
Comparison of Impacts
Handies Peak

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY
Wilderness Values	Although 7,885 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights in American Basin could reduce the acreage on which wilderness values would actually be preserved to 6,885. Wilderness values could be lost on 400 of the 10,975 acres recommended nonsuitable as a result of mineral development on private property near Campbell Creek. An additional 10 to 20 acres would be lost to mineral exploration. In the long term wilderness values would be lost on the entire 10,975 acres recommended nonsuitable.	Although the entire 18,860 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 17,460.	Wilderness values would be lost on about 1,400 acres as a result of mineral activity. Wilderness values would be unprotected on the remaining acreage and in the long term would be lost.	Although 8,220 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights in American Basin could reduce the acreage on which wilderness values would actually be preserved to 6,820. About 10 to 20 acres would be lost within the nonsuitable area as a result of mineral exploration. In the long term wilderness values will be lost on the 10,640 acres recommended nonsuitable.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY
Mineral Resource Development	The 7,885 acres recommended suitable would be withdrawn from entry, although three mines are projected based on valid existing rights. One small scale mine would be developed within the nonsuitable area.	Subject to valid existing rights the entire 18,860 acres would be withdrawn from mineral entry. Valid rights are expected to allow for development of base and precious metals from 4 mines in the American Basin and Campbell Creek areas.	The entire WSA would remain open to entry with development of base and precious metals, uranium, and strategic minerals projected to result from 4 mines.	The 8,220 acres recommended as suitable would be withdrawn from entry. Valid existing rights would allow for development of three mines in American Basin and one near Campbell Creek. No development is projected in the nonsuitable portion of the WSA although exploration would continue.
Recreation Use	The existing 3,000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur in the suitable area except where affected by mineral development in American Basin. This use will increase by about 9 percent annually. Use of the nonsuitable area for hunting access would continue and increase by about 5 percent annually. Mineral development near Campbell Creek would detract from the backcountry experience in that area.	The current 4,000 RUDs would increase by about 9 percent annually with designation. Hiking, hunting, camping, photography, and mountain climbing would continue to occur in a primitive backcountry setting except on about 1,400 acres affected by mineral development.	The existing 4,000 RUDs would increase by about 5 percent annually. Existing activities would continue to occur in a primitive backcountry setting except in American Basin and near Campbell Creek where the setting would be influenced by the sights and sounds of mineral activity.	The existing 3,000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur in the suitable area except where affected by mineral development in American Basin and Campbell Creek. This use will increase by about 9 percent annually. Use of the nonsuitable area for hunting access would continue and increase by about 5 percent annually.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY
Soils	Within the suitable area productivity would be lost on 115 acres as a result of mineral development. Disturbance of 10 to 20 acres from exploration activities would be prevented. Soil would be disturbed and productivity lost on 10 to 20 acres as a result of mineral exploration in the nonsuitable area. Overall 125 to 145 acres would be disturbed.	Soil productivity would be lost on up to 115 acres as a result of mineral development. Disturbance of 20 to 40 acres from exploration activities would be prevented.	Soil productivity would be lost on about 115 acres as a result of mineral development. Soil would be disturbed and productivity lost on 20 to 40 acres as a result of mineral exploration. Overall 135 to 155 acres would be disturbed.	Within the suitable area productivity would be lost on 115 acres as a result of mineral development. Disturbance of 10 to 20 acres from exploration activities would be prevented. Soil would be disturbed and productivity lost on 10 to 20 acres as a result of mineral exploration in the nonsuitable area. Overall 125 to 145 acres would be disturbed.
Water Quality	Mineral exploration and development resulting from valid existing rights within the suitable area would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork. Preclusion of exploration activity would prevent any additional contamination of this drainage. Mineral exploration and development in the nonsuitable area would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, water quality could be degraded in up to 5 miles of stream.	Mineral exploration and development resulting from valid existing rights within the WSA would cause some unquantified increase in sediment and heavy metal concentrations in 5 miles of the Lake Fork and Campbell Creek. Preclusion of exploration activity as a result of designation would prevent any additional of contaminations these drainages.	Mineral exploration and development within the WSA would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork and Campbell Creek. Mineral exploration would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, up to 5 miles of stream could be affected.	Mineral exploration and development resulting from valid existing rights within the suitable area would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork. Preclusion of exploration activity would prevent any additional contamination of this drainage. Mineral exploration and development in the nonsuitable area would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, about 5 miles could be affected.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS	WILDERNESS MANAGEABILITY
Wildlife	Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Exploration activity would be precluded within the suitable area thereby protecting bighorn sheep and elk habitat. Mineral development and exploration in the nonsuitable area could result in a loss of about 5 bighorn sheep. Habitat would be protected on 7,885 acres.	Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Exploration activity would be precluded thereby protecting bighorn sheep and elk habitat. Mineral development and exploration in the Campbell Creek area could result in a loss of about 5 bighorn sheep. Habitat would be protected on 18,860 acres.	Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Mineral development and exploration could result in a loss of about 5 bighorn sheep. Habitat would not be protected by designation.	Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Mineral development in the Campbell Creek area would result in a loss of about 5 bighorn sheep. Exploration activity would be precluded within the suitable area thereby protecting bighorn sheep and elk habitat on 8,220 acres.

Table 2-3
Comparison of Impacts
American Flats

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS
Wilderness Values	The 1,505 acres recommended suitable would receive the protection provided by wilderness designation. Wilderness values would be lost on about 315 acres within the nonsuitable area as a result of mineral exploration and development and eventually lost on the entire 3,205 acres recommended.	Although 4,710 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values are actually preserved to 4,410.	Wilderness values would be lost on up to 320 acres primarily in the southeast portion of the WSA as a result of mineral exploration and development activity. Wilderness values on the remaining acreage would eventually be lost to human encroachment.
Mineral Resource Development	Although the 1,505 acres recommended suitable would be withdrawn there should be no impact as the area has low potential for development. The remaining area would remain open to entry with one mine projected in the southeast portion of the WSA.	Subject to valid existing rights exploration would be precluded within the entire 4,710 acres. Development of one mine in the southeastern portion of the WSA is projected to occur.	The entire WSA would remain open to entry with production of base and precious metals projected to result from one mine.

American Flats

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS
Recreation Use	The 1,200 RUDs in the suitable area are expected to increase by about 9 percent annually. The hiking and hunting activities in this area will continue to occur in a backcountry setting. This setting would continue in the nonsuitable portion as well except near the potential mineral development. The 300 RUDs in the nonsuitable portion would increase by about 5 percent annually.	The existing backcountry setting and existing uses would be maintained except in the vicinity of projected mineral development where it would be altered to one influenced by the sights and sounds of mining activity. Recreation use of about 1,500 RUDs would increase by about 9 percent annually.	The existing backcountry recreation setting would remain except where altered by mineral development. The existing 1,500 RUDs would increase by about 5 percent annually.
Soils	Soil productivity would be protected within the suitable area and lost on up to 40 acres within the nonsuitable portion.	Soil productivity would be preserved on 10 t0 15 acres that would otherwise be lost due to exploration work. Productivity would be lost on up to 15 acres as a result of mineral development.	Soil productivity would be lost on up to 40 acres as a result of mineral exploration and development.
Water Quality	Water quality would be protected within the 1,505 acres recommended as suitable. Disturbance of up to 40 acres in the nonsuitable area due to mineral exploration and development could result in some unquantified degradation of water quality in small drainages in the WSA and in less than 1 mile of Henson Creek.	Disturbance would be precluded and water quality protected with the exception of one mineral development resulting from valid existing rights. Some unquantified contamination of less than 1 mile of Henson Creek could occur.	Disturbance of up to 40 acres due to mineral exploration and development could result in some unquantified degradation of water quality in small drainages in the WSA and less than 1 mile of Henson Creek.

	PROPOSED ACTION	ALL WILDERNESS	NO WILDERNESS
Wildlife	Designation would protect habitat for 11 bighorn sheep. Mineral exploration and development in the nonsuitable portion of the WSA would have minimal impact on wildlife habitat.	Designation would protect habitat for 11 bighorn sheep. Mineral development would have a minimal effect on wildlife habitat.	Mineral exploration and development in the southeastern portion of the WSA would have minimal impact on wildlife habitat.

Table 2-4
Comparison of Impacts
Bill Hare Gulch

	PROPOSED ACTION	ALL WILDERNESS	WILDERNESS MANAGEABILITY
Wilderness Values	No protection will be provided, however, wilderness values are not expected to be affected by non-designation.	Wilderness values on 370 acres would be protected on the long term.	Wilderness values would be legislatively protected on 325 acres. Values are not expected to be impacted on the remaining 45 acres.
Mineral Resource Development	Mineral resource development would not be affected by non-designation since no development is predicted.	Exploration would be foregone. Since the potential is low there would be no impact on mineral resource production.	No impact on mineral development is expected in the suitable or nonsuitable portions of the WSA.
Recreation Use	Recreation use would continue to be for access to the Big Blue Wilderness and should not exceed 100 RUDs.	Designation would protect the existing setting but would not affect use within the WSA. Use would remain at about 100 RUDs.	The recreation setting would not change in either the suitable or nonsuitable areas. Use patterns or amounts (100 RUDs) would not change as a result of designation or non-designation.

Table 2-5
Comparison of Impacts
Larson Creek

	PROPOSED ACTION	ALL WILDERNESS	WILDERNESS MANAGEABILITY
Wilderness Values	Although no protection would be provided wilderness values on the 900 acre WSA are not expected to be affected by non-designation.	Wilderness values on 900 acres would be protected on the long term.	Wilderness values would be legislatively protected on 480 acres. Values would not be protected on the remaining 420 acres but they are not expected to be affected by non-designation.
Mineral Resource Development	Mineral resource development is not expected to be affected by non-designation since no development is predicted.	Exploration would be foregone. Since the potential is low there would be no impact on mineral resource production.	No impact on mineral development or exploration in the suitable or non-suitable portions of the WSA is expected.
Recreation Use	Recreation use would remain at about 20 RUDs.	Designation would protect the existing setting but would not affect use (about 20 RUDs) within the WSA.	The recreation setting would not change in either the suitable or nonsuitable areas. Use patterns or amounts (20 RUDs) would not change as a result of designation or non-designation.

CHAPTER 3

AFFECTED ENVIRONMENT

INTRODUCTION

This chapter describes the environmental setting associated with the five WSAs included in this environmental statement. All of the WSAs exist in close proximity to each other and, therefore, have much in common in terms of their resources. The first part of this Chapter discusses those resources that are common to all of the WSAs. The remainder of the Chapter addresses each WSA individually.

In most cases the affected environment described in this Chapter encompasses a wider range of resources then is actually expected to be affected by the proposed action or alternatives. This detailed description is provided to give a better overall picture of the environment involved in each of the WSAs. Those resources not affected will not be addressed in Chapter 4.

COMMON RESOURCE VALUES

Air

This planning area contains several areas which are classified as Class I air quality increments by the Clean Air Act Amendments of 1977. They include the Weminuche Wilderness Area, La Garita Wilderness Area, and the West Elk Wilderness Area. In addition, one area, the BLM Powderhorn Primitive Area, was proposed as Class I on June 25, 1980 by the Department of the Interior. The United States Department of Agriculture proposed two additional areas for Class I (the Uncompahgre Primitive and the Wilson Mountain Primitive areas)(Federal Register Vol. 45, No. 124, pgs. 43002-43007). Both of these areas were designated as Wilderness in December, 1980. All remaining lands in the area have been designated as Class II air quality management areas.

The establishment of these air quality classes provides given standards for sulfur dioxide that will be allowed within the area for given periods of time. These standards can be found in the Clean Air Act as Amended, August, 1977 and the Colorado Air Quality Control Act, 1979.

Currently, there are no significant sources of pollution within the immediate area of the wilderness study areas. Minor local sources of pollution (smoke, dust, etc.) occur due to landfill burning and the unpaved roads in the areas.

Soils

The soil survey of the Gunnison Area, Colorado (SCS 1975) encompasses Bill Hare Gulch and Larson Creek WSAs. The soils in the Redcloud Peak WSA and eastern portion of Handies Peak WSA were mapped in 1982 as part of the Ouray Soil Survey. American Flats does not have a detailed soil survey. The general soil map of Hinsdale County is the only present source of soil data for this unmapped area.

The subalpine forests, which are associated with the Posant-Woodhall-Stony rock land associations and Cryoboralfs, have low natural erosion rates, less than 0.1 ton/acre/year. While quantifiable data are lacking for the alpine areas, soil erosion is dependent upon soil surface texture, slope, climatic factors, and the amount of bare soil.

Breaks in the vegetative ground cover of a soil can result in greatly accelerated erosion. This is especially critical on the steep alpine areas. These fragile areas are very slow to heal due to their extreme temperature fluctuations, short growing season, high winds, and intense solar radiation.

Water Resource

The Redcloud Peak and Handies Peak WSAs contain much of the headwaters of the Lake Fork of the Gunnison River and its tributaries; most notably Henson Creek.

Within a national perspective, these headwaters are a portion of the Colorado River System.

Approximately 2.6 percent of the Upper Colorado River Basin waters either originates or travels through these five WSAs included within this study. The Upper Colorado River Basin water is of critical regional concern to the arid Western Slope of Colorado. Thus, the water originating in or passing through are significant at a local and regional level as future demands are placed on the water resource.

Visual Resources

All five WSAs covered in this EIS have been designated for visual resource management Class II. This classification allows for changes to their landscape features provided these changes are not dominant.

The Redcloud Peak, Handies Peak, American Flats, Bill Hare Gulch, and Larson Creek WSAs are characterized by outstanding scenic quality "A" composed of high alpine ridges and peaks, rolling flats and steep forested slopes dissected by stream canyons, and dotted by small alpine lakes.

Bill Hare Gulch and Larson Creek border the Lake Fork Valley on the west with steep talus slopes, cliffs and low rounded ridges and peaks ascending to alpine elevations in the Big Blue Wilderness Area further west.

The degree of modifications in all the WSAs is minimal and overall sensitivity to visual changes is high.

Bill Hare and Larson Creek lie adjacent to a primary state highway travelled by thousands of vacationists and sightseers during the summer and fall.

The study area's landscape character includes sight scenic quality rating units, each with similar landform and vegetation patterns for each appropriate WSA (see Appendix 3.4 and 3.5).

Terrestrial Wildlife

The WSAs contain habitats used by numerous wildlife species. Review of the Colorado Division of Wildlife's Latilong Studies for bird, mammal, reptile, and amphibian distributions (Kingery and Grand 1978, Bissell 1978, and Largiois, 1978) as compiled by Ireland (1981) indicates that the WSAs, as a whole, have the habitat potential of supporting 228 species of birds, 53 mammal species, and up to eight species of reptiles and amphibians.

Of the 289 potential species, only 114 (68 birds, 44 mammals, and 2 reptiles or amphibians) should be considered as typically occurring in the high elevation habitats common in these WSAs.

There are no known resident populations of federally endangered species within the WSAs. During migrations, however, peregrine falcons and bald eagles might be seen in the area.

Aquatic Wildlife

Several miles of the streams associated with the WSAs contain fisheries consisting primarily of brook and rainbow trout. Although no intensive inventory data is available on many of the smaller tributaries within the WSAs, extensive surveys indicate these tributaries may provide conditions suitable for supporting trout populations. The Colorado Division of Wildlife supplements some of the fisheries through stocking programs.

Geology and Mineral Deposits

The northern San Juan Mountains are characterized by a period of volcanic eruptions which took place during the Tertiary period. Volcanic activity first began about 30 million years ago and then subsided about 22 million years ago, with only sporadic eruptions for several million years thereafter. Associated with this

period of volcanic activity, large areas were subjected to doming and subsequent collapse, forming features known as calderas. In some cases, multiple episodes of doming, collapse, and resurgence occurred. During this violent period, certain areas were subjected to alteration by hydrothermal solutions and to injection of ore-bearing fluids which crystallized upon cooling.

The resulting mineralized areas associated with this highly active volcanic region were and still are responsible for a large part of the total state mineral production. The following table, adapted from the USGS publication Mineral Investigation Map MR-58, represents the value of minerals produced in the general area of the WSAs being considered. Production values are expressed in dollar value at the time of production, a period from the late 1800s to 1970. Since the values of metals, particularly gold and silver, have increased sharply since 1970, the value of these commodities at current metal prices would be at least ten times the value shown.

County	Mining District	Total Production
Hinsdale	Henson Creek	$ 9,249,900
	Lake Fork	1,995,600
Ouray	Red Mountain	17,253,550
	Sneffels	47,726,500
	Uncompahgre	65,986,560
San Juan	Animas	59,702,100
	Eureka	79,179,568
San Miguel	Ophir	7,576,453
	Telluride	256,177,100
Dolores	Rico	48,292,399
La Plata	La Plata	5,806,662
Mineral	Creede	80,614,014
	TOTAL	$679,520,356

The four mining districts in the immediate area of the WSAs, Animas, Lake Fork, Eureka, and Henson Creek had a combined total production value to 1970 of 150 million dollars. This figure, adjusted to current metal prices would be in excess of 1.5 billion dollars.

Current mineral exploration, both within the areas under wilderness review and in adjacent areas, shows a renewed interest in the precious metals and associated base metals which were produced historically in the region, and an interest in other metals which have been shown to have the potential for existing in economic deposits.

Standard Metals Company (at Howardsville) is the only major milling facility in the general area. They report the total value of concentrates for the three month period April to June, 1981 at about 6.4 million dollars.

A system for evaluating mineral potential was suggested at the workshop held in Denver, August 18, 1981, and has been adopted for use in this analysis. This system appears in Appendix 3.8.

As identified in the Stockpile Report to Congress (Federal Emergency Management Agency, 1980) there are several strategic and critical minerals found within these WSAs; nickel, cobalt, aluminum, beryllium, copper, lead, zinc, molybdenum, silver, tungsten, and vanadium. There is no present information other than for aluminum ore in Redcloud Peak WSA, on whether or not these minerals are found in quantities that are economically feasible to mine.

Recreation

In 1984, the BLM conducted a Recreation Visitor Preference Survey in the Gunnison Basin and American Flats/Silverton planning units. The Redcloud Peak, Handies Peak, and American Flats WSAs are all within this planning area. Although the

study did not provide data specific to each WSA, it did provide indications of the general use and preferences within the overall area.

The study showed that during the period from July 20, 1984 to October 19, 1984, almost 75,000 people visited this area spending an average of 4.4 Recreation User Days (RUDs). This totalled 330,000 RUDs during the survey period. Many of the people surveyed came to the area for motorized recreation. This occurs primarily on the Loop Road and other primitive roads in the area but not within the WSAs themselves. About 15 percent of those surveyed identified backcountry related activities as their primary recreation choice. Twenty percent indicated that on a future trip their first choice would be backcountry related and over half listed backcountry related activities in their five most preferred activities. Use figures will be addressed specifically for each WSA later in the Chapter.

Within each Wilderness Study Area, different opportunities for primitive and unconfined types of recreation exist. These different opportunities can be recognized and classified according to the types of experience that can be achieved in a particular setting.

Six broad classes of recreation can be identified on a spectrum or continuum. They are classified according to such factors as remoteness, size, amount of resource alteration, user density and managerial constraints. The WSA may include up to five of these classes, indicated as follows:

Primitive
Semi-Primitive (Non-Motorized)
Semi-Primitive (Motorized)
Roaded Natural
Rural

The names of these classes do not imply the presence nor the absence of such things as ways, motorized use, or other resource alterations.

Types of activities available from area to area within each WSA are relatively similar. However, the environmental settings for these activities may vary widely. Recreation opportunity classes describe these differences in setting.

By comparing the relative percentages of each recreation opportunity class that would be included in the various alternatives, effects on potential wilderness users, and on the types of management that could be applied, can be described. Appendix 4.5 illustrates how those recreation opportunity classes can be used to depict the variety of primitive and unconfined recreation included in each WSA alternative.

Economic Analysis

Economic interest in the WSAs involves their use for grazing, mineral and timber production, recreation, and as taxable assets. Since federal funds and property taxes are collected on a county basis, they will be discussed by county rather than by WSA.

Hinsdale County: Redcloud Peak, Handies Peak, Bill Hare Gulch, Larson Creek, and part of American Flats

Ouray County: Part of American Flats.

Public Funds and Property Taxes

Hinsdale County

Federal Funds: Federal Payment in Lieu of Taxes (PILT) funds for Hinsdale County in 1985 was $21,753. This was paid on a total public land acreage of 675,970 acres on which BLM administers 117,984 acres. Thus, BLM's share was $3,796. Given the small population in the county, these funds are limited by population rather than acreage. Unless there occurs a change in the PILT program, these funds would continue.

Property Taxes Both patented lands and unpatented mining claims are taxed as private property within the county of jurisdiction. Redcloud Peak and Handies Peak WSAs in particular contain numerous mining claims. Hinsdale County collected approximately $15,000 in 1985 from patented lands and mineral claims within the WSAs in its jurisdiction. Total taxes collected equalled $611,000.

Ouray County

Federal Funds: In 1985, Ouray County collected $81,549 in PILT funds, of which BLM's share was $13,209. These funds are limited by population rather than acreage in Ouray County. Unless there occurs a change in the PILT program, these funds will continue.

Property Taxes: Ouray County collected less than $50 in property taxes in 1985 from mineral claims within the part of the American Flats WSA in its jurisdiction.

REDCLOUD PEAK

Topography

The Redcloud Peak Wilderness Study Area (WSA) is an area of about 62 square miles of steep, mountainous topography bounded on three sides by major stream drainages and internally drained by smaller streams radiating from a central ridge of mountain peaks. Elevation varies from about 8,800 feet to 14,000 feet, with extensive areas above timber line at approximately the 12,000 foot contour.

Soils

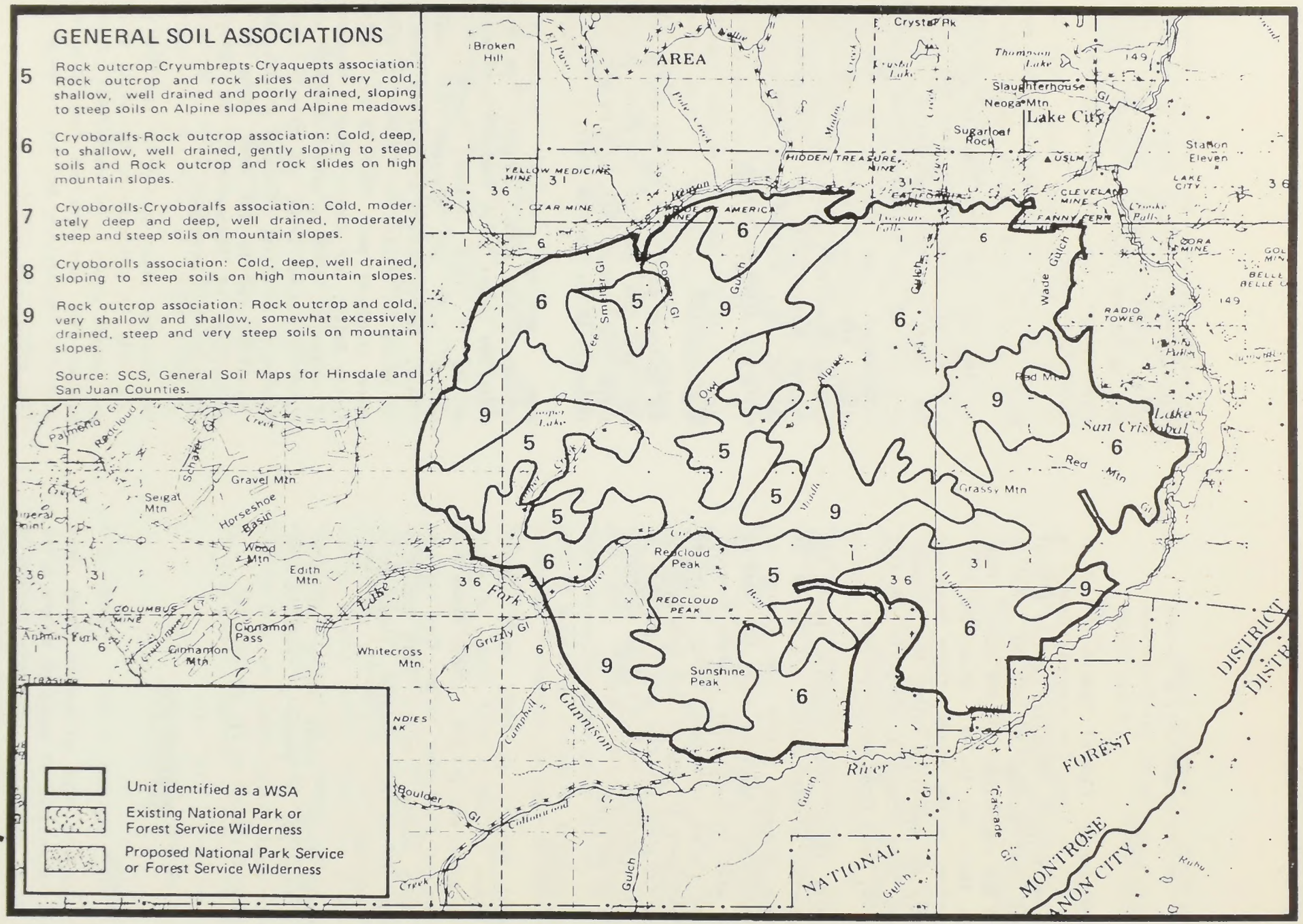
The Redcloud Peak WSA consists of three primary soil associations (see Map 3-1). The lower elevation peripheries consist primarily of the Cryoboralfs-Rock Outcrop association. The core of the WSA and higher elevations consist of the Rock Outcrop-Cryumbrepts-Cryaquepts and Rock Outcrop associations; which are generally shallow, well drained, and difficult to revegetate after disturbance.

Water Resource

The southern portion of the WSA drains into the Lake Fork and the northern portion drains into Henson Creek, both of which are tributary to the Gunnison River.

Water quality varies considerably throughout the area. Samples from Bent Creek and Copper Gulch indicate high water quality in these streams; however, the samples were not analyzed for heavy metals. Concentrations of lead and cadmium in excess of state and federal drinking water standards were found in Owl Gulch, Alpine Gulch, and Cooper Creek. Maganese in excess of drinking water standards was found in Cooper Creek and Silver Creek. Because of wildlife, livestock grazing, and recreation use in the area there is a possibility of contamination of surface waters by fecal pathogens.

The domestic water supply for the town of Lake City is furnished by two wells which tap ground water. The watersheds of the Handies Peak and Redcloud Peak WSAs are partially responsible for the recharge of this ground water supply.


R 6 W
R 5 W
T 43 N
T 42 N
GENERAL SOIL ASSOCIATIONS
5 Rock outcrop-Cryumbrepts-Cryaquepts association: Rock outcrop and rock slides and very cold, shallow, well drained and poorly drained, sloping to steep soils on Alpine slopes and Alpine meadows.
6 Cryoboralfs-Rock outcrop association: Cold, deep, to shallow, well drained, gently sloping to steep soils and Rock outcrop and rock slides on high mountain slopes.
7 Cryoborolls-Cryoboralfs association: Cold, moderately deep and deep, well drained, moderately steep and steep soils on mountain slopes.
8 Cryoborolls association: Cold, deep, well drained, sloping to steep soils on high mountain slopes.
9 Rock outcrop association: Rock outcrop and cold, very shallow and shallow, somewhat excessively drained, steep and very steep soils on mountain slopes.
Source: SCS, General Soil Maps for Hinsdale and San Juan Counties.
Unit identified as a WSA
Existing National Park or Forest Service Wilderness
Proposed National Park Service or Forest Service Wilderness
Lake City
Broken Hill
Crystal Pk
Thompson Lake
Slaughterhouse Gl
Neoga Mtn
Sugarloaf Rock
Station Eleven
HIDDEN TREASURE MINE
YELLOW MEDICINE MINE
OZAR MINE
AMERICA MINE
CLEVELAND MINE
FANNY FERN MINE
LAKE CITY
RADIO TOWER
Red Mtn
San Cristobal Lake
Grassy Mtn
Redcloud Peak
REDCLOUD PEAK
Sunshine Peak
Gravel Mtn
Seigal Mtn
Horseshoe Basin
Wood Mtn
Edith Mtn
Lake Fork
COLUMBUS MINE
Cinnamon Pass
Cinnamon Mtn
Whitecross Mtn
Grizzly Gl
Gunnison River
Boulder Gl
NATIONAL FOREST
MONTROSE
CANON CITY
DISTRICT
0 1 2 3 4 5 Miles

MAP 3 - 1

Vegetation

Vegetation varies with altitude, from mixed coniferous forest and aspen occupying the lower slopes to alpine tundra, consisting of high-altitude species of grasses, forbs and shrubs, in the higher elevations. Many areas are above timber line and are steep, rocky and devoid of vegetation.

Forested areas in this WSA extended from 8,600 feet to the 12,200 foot contour. Tree species vary primarily with elevation and slope aspect.

Douglas-fir occurs primarily on steep, rocky slopes between 8,600 feet and 10,000 feet, and occupies 599 acres.

Engelmann spruce-subalpine fir type occupies 7,742 acres in drainage bottoms and on lower slopes between 9,500 and 11,000 feet. Above 11,000 feet, this type is nearly pure Engelman spruce and takes on a Krummholtz or stunted growth form. Spruce-fir timber is in mature to over-mature stands with a multi-storied structure.

There are 5,494 acres of aspen within the WSA. It occurs primarily on slopes that were denuded of timber in the past by fire or avalanche or occupies sites which cannot support other species.

Terrestrial Wildlife

This WSA contains extensive elk and bighorn sheep summer ranges which support an estimated 213 elk and 21 bighorn sheep. In addition, localized mule deer summer range supports about 120 deer along the eastern and northeastern portion of the WSA. The area contains winter range for an estimated 33 elk along its eastern edge and for 16 bighorn sheep along its southern edge. While summer range is not generally the limiting factor in big game populations, the winter range often is. Thus, the area's summer range could support larger numbers of big game animals if the winter range were available.

Aquatic Wildlife

There are approximately 40 miles of aquatic and riparian habitat within the Red Cloud Peak WSA that have not, to date, been adequately inventoried. Part of the aquatic objectives of the Gunnison Basin Habitat Management Plan (HMP) will be to inventory these streams and determine their aquatic/riparian values.

Water quality is generally poor; primarily because of heavy metals leaching out of the soil within the area. According to 1979 "spot check" inventories, Bent Creek has good aquatic/riparian habitat and a fairly productive fishery. Alpine Gulch has some fair aquatic/riparian habitat in the lower portion and contains an unquantified fishery. No fish have been observed in the lower portion of Cooper or Silver Creeks, and current data is inadequate to determine habitat quality. The upper portion of Cooper Creek and Cooper Lake contain stocked cutthroat trout.

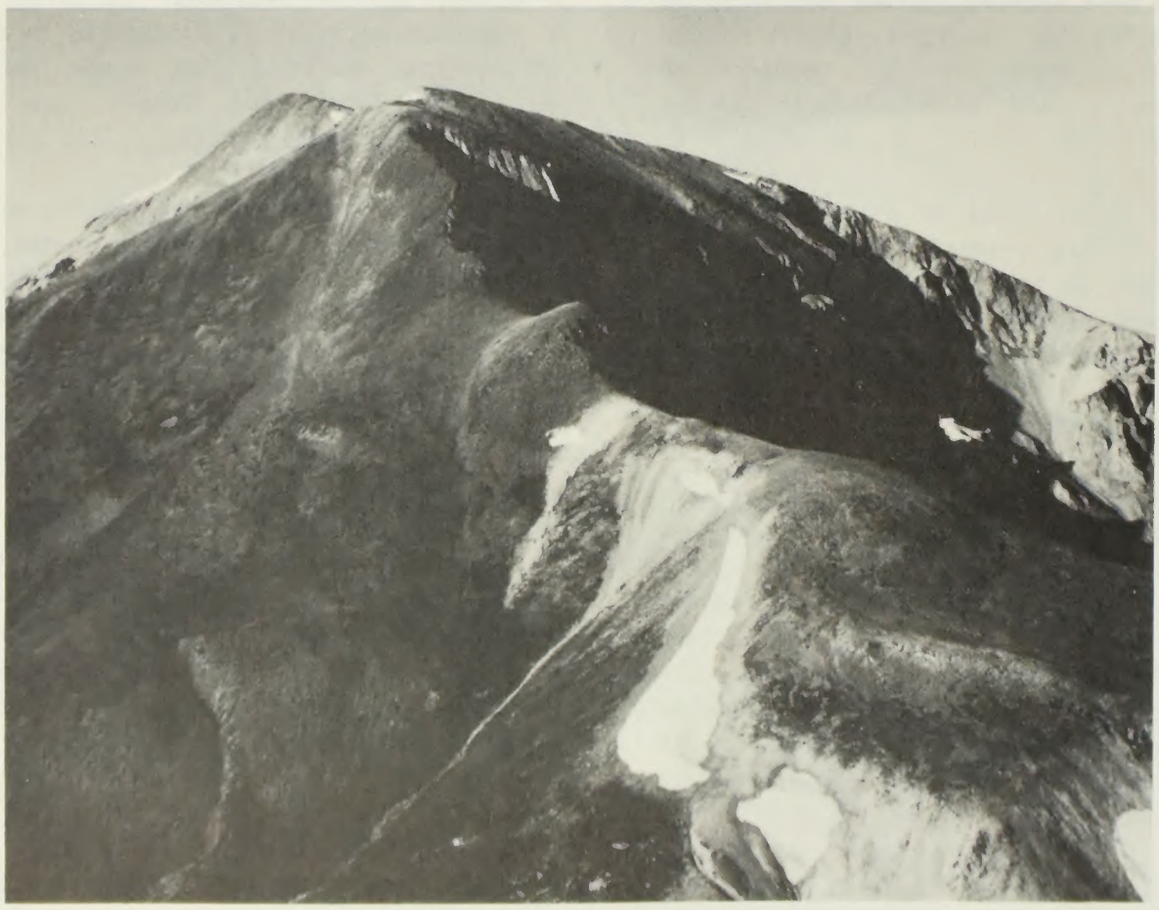
The remainder of the tributaries within the WSA have not been investigated, and a search of Colorado Division of Wildlife's files indicated there was no data available at this time. Approximately 95 percent of the estimated 40 miles of aquatic habitat run through lands administered by BLM.

Wilderness Resource

The Redcloud Peak WSA contains 40,575 acres of which approximately 280 acres are private mineral patents within the boundaries of the WSA. Approximately 1,730 acres of state-owned mineral inholdings with the surface administered by BLM are also within the boundaries.

The area includes the majority of the Lake Fork Mountains, an extremely rugged and colorful chain of volcanic mountains within

Aerial view of Cooper Lake at the head of Cooper Gulch
in the Redcloud Peak WSA



View of Redcloud Peak from the head of Bent Creek;
Redcloud Peak WSA

Grassy Mountain, south of Red Mountain, in the Redcloud Peak WSA

View looking south of lake City and Red Mountain (see arrow); Redcloud Peak WSA

the Lake City Caldera. It is characterized by numerous 13,000 foot mountain peaks and ridges. Redcloud Peak, 14,034 feet, and Sunshine Peak, 14,001 feet, are dissected by glaciated valleys radiating towards either Henson Creek on the north or the Lake Fork of the Gunnison River on the south and east. The upper valleys have steep, sparsely vegetated, talus covered, side slopes 800-1,200 feet high.

The central core of this WSA is alpine tundra. The peripheries and large portions in the eastern half of the WSA are heavily forested in spruce and aspen. It contains rock glaciers and numerous cascades and waterfalls.

Cooper Lake is the only major lake within the WSA. Mineral prospects and old cabin remnants are all substantially unnoticeable and may be of historical value.

Some imprints associated with mining and access are found within the WSA. About 10 miles of vehicle ways are found in Cooper Creek, Silver Creek, Alpine Gulch and Williams Creek. These routes are two-wheeled tracks or abandoned. The Alpine Gulch way has not been maintained for over twenty years. Spruce trees and aspen, as high as ten feet, now grow in the center of the path. In several locations, the route is washed out. The Williams Creek track has been water-barred and some downed aspens block passage. The routes up Cooper Creek and Silver Creek are two-wheeled tracks. All of the ways were found to be substantially unnoticeable within the context of the wilderness.

The overall influence of human imprints on the naturalness of the area as perceived by the average visitor is negligible. The Redcloud Peak WSA contains outstanding opportunities for solitude. The area is extremely rugged; high mountain peaks and cascading streams provide numerous opportunities for solitude. The mountainous terrain, with its expanses of alpine tundra and open scenic vistas, projects feelings of vastness. The lower elevations and canyons in the eastern portion of the area contain densely forested lands which provide opportunities for seclusion and intimacy.

The WSA, combined with its relative large size, diversity, and ruggedness of terrain offers outstanding opportunities for primitive and unconfined recreation. The numerous peaks, including Redcloud Peak at 14,034 feet and Sunshine Peak at 14,001 feet, provide excellent hiking and climbing opportunities. The glacial valleys, waterfalls, and tarns facilitate recreational activities such as backpacking, camping, fishing, and photography. Wildlife viewing and hunting are also activities which occur in this WSA. Redcloud Peak (14,034 feet) is the 45th and Sunshine Peak (14,001 feet) is the 54th highest mountain in Colorado. In 1874 members of the Hayden Survey were the first recorded to have ascended these peaks. At this time the Hayden party referred to Sunshine Peak simply as "Station 12". Up until the early 1900s Sunshine Peak was called either "Niagara Peak" or "Sherman Mountain". The Wheeler Survey, also in 1874, named Redcloud Peak although previously it was known as either "Red Mountain" or "Jones Peak" (Bueler 1974). The scenic quality of the area is outstanding due to the combination of mountainous landforms, multi-colored rock stratas, diverse vegetation and vast, open vistas.

There are scientific and educational as well as geologic and ecologic values as this area is an extinct volcanic calera with abundant wildlife - deer, elk, bighorn sheep, and golden eagles.

Cultural Resource

There are five identified historical sites in this area. These sites are all mining related structures and some date back to

1880. The inventoried sites are on the periphery of the area, but there are several other historic structures within the area which have not yet been inventoried (see Appendix 3.9). None are on or considered eligible for listing on the National Register of Historic Sites.

Land and Access

Redcloud Peak is approximately 40,575 acres of public lands under the jurisdiction of the Bureau of Land Management. The entire area is classified for multiple use under C-2367.

Certain tracts of land were granted to the State of Colorado as "school sections." These lands were later reconveyed to the United States with a reservation of the mineral estate to the State of Colorado. These lands were originally described by suspended survey and are now described by an approved protraction diagram (see Map 1-2).

These lands are described as follows:

T.43N., R.4W., N.M.P.M.

Original Survey - Section 16
Approved Survey - Tracts 38 and 39,
240 acres

T.43N., R.5W., N.M.P.M.

Original Survey - Sections 16 and 36
Approved Survey - Portions of Sections
8, 9, 16, 17, 25, 26,
35, and 36,
1,280 acres

T.44N.,R.5W., N.M.P.M.

Original and Approved Survey - Section
36,
480 acres
About 160 acres in WSA

T.42N., R.5W., N.M.P.M.

Original Survey - Portion of section 16
Approved Survey - Portion of Section 9
40 acres

T.43.N., R.6W., N.M.P.M.

Original Survey - Section 36
Approved Survey - Portions of Sections
25 and 36,
About 10 acres in WSA

The total area within the WSA on which the State of Colorado owns the mineral estate is 1,730 acres, most of which is leased to companies or individuals for mineral exploration.

Legal access to the WSA is provided by county roads along Henson Creek and the Lake Fork, and a county road to the communication site on Round Mountain at the eastern boundary of the study area. Three trails provide access into the area in Alpine Gulch, Silver Creek, and Cooper Creek. There is a withdrawal along the county roads on Henson Creek and the Lake Fork of the Gunnison River for the protection of recreation values.

There are 25 parcels of private land inholdings within the study area having an aggregate total of 280 acres. All of these lands are patented mining claims (see Map 1-2). These 280 acres are not part of the WSA.

Livestock Grazing

Five grazing allotments are located at least partly within this area, with a total production of 1,449 Animal Unit Months (AUMs). These allotments are grazed by sheep from the first of July through the first of October. No fences, water development, or vehicle access routes are used or needed for the current sheep operations. While intensive management is proposed for these allotments, which would rotate use areas and periods of use, improvement projects are not proposed.

Forestry

Timber production capability is based on site quality, potential reforestation problems, fragile soils, and adverse stand locations. All timber on slopes greater than 35 percent and all non-commercial species were withdrawn from the timber production base. Of the 13,835 acres of forest within this area, 13,242 acres are withdrawn by timber production capability classification. The "no problem" classification of this area amounts to 593 acres containing 4,744 thousand board feet (MBF) with a potential sustained-yield volume of 48 MBF per year. This is not under intensive management and no harvest is projected.

Recreation

The Redcloud Peak WSA with its expanses of alpine tundra, high mountain peaks, numerous canyons and scenic ridges provides an excellent setting for a variety of recreation opportunities. Activities which currently take place in the WSA include hiking, backcountry camping, the viewing of scenery, horseback riding, hunting, mountain climbing, nature study, photography, fishing, and rockhounding.

There are three main trails which provide access to the WSA. The Silver Creek trail is the most popular because it is the main route to Redcloud and Sunshine Peaks which are two of Colorado's 54 peaks over 14,000 feet.

The Cooper Creek trail is used less than Silver Creek but still popular because it provides access to Cooper Lake. The Alpine Gulch trail is little used because of the difficult stream crossing of Henson Creek at the beginning of the trail. If the crossing were made easier, this remote area would undoubtedly get much more use. In addition, cross country hikers use trailless areas in the WSA such as Red Mountain, Williams Creek, Owl Gulch, Lee Smelter Gulch, and Rock Creek.

No accurate use figures for the area are available as no trail registers exist and the WSA is patrolled only sporadically by a backcountry ranger. The Colorado Outward Bound School has used this area each summer since 1970. Their use each season ranges from 400 to 700 Recreation User Days (RUDs). The Colorado Mountain Club maintains registers on Redcloud and Sunshine Peaks. Although not everyone knows or takes the time to sign these registers, they do provide an estimate of use. These records show 1,200 people reaching these summits from 1970 to 1980.

Based on the Visitor Preference Survey and other available data, recreation use in the Redcloud Peak WSA is estimated at 5,000 RUDs.

Minerals

Redcloud Peak WSA is essentially congruent with the Lake City Caldera. The bounding ring fault and associated radial fracture pattern of this caldera are highly mineralized. In addition, there are intra-caldera fractures and associated zones of intense hydrothermal alteration which are very favorable host rocks for mineral deposits. Geophysical and geochemical measurements in this area indicate a potential for economic deposits of the minerals traditionally mined in this area - gold, silver, copper, lead, and zinc, as well as numerous other minerals never before extracted in this area.

A report by John F. Slack (1980) describes the vein-ore associations of the Lake City Caldera, and pertains particularly to the northern and northeastern portions of the study area. The report describes two distinct mineral assemblages which were responsible for the ores historically mined in the Henson Creek and Lake San Cristobal mining districts, and relates the ore implacement to the cycle of collapse and resurgence of the Lake City Caldera.

Of particular interest within this WSA is the Red Mountain alunite deposit, located within the eastern half of the WSA. Associated with the collapse of the Lake City Caldera, a plug of molten material was intruded along the ring fault and cooled to form a mass of rock type known as quartz latite. This rock was subjected to later alteration of hydrothermal fluids containing sulfuric acid, a process called solfataric alteration, which modified the feldspars of the original rock to form alunite, or hydrous potassium aluminum sulfate. Alunite has been shown to be an ore of aluminum, with potential for the production of co-products of potash and sulfuric acid, and possible recovery of other trace elements that may exist in the deposit.

Initial exploration of the alunite deposit reveals the following data for aluminum, which would be the principle product of this deposit.

Demonstrated reserves of ore, which include both measured and indicated ore, total 55 million tons containing an average of 39.6 percent alunite. An additional 1.5 billion tons of ore is inferred. The aluminum contained in the demonstrated reserves would be about 5 million tons. If the inferred reserves can be demonstrated, an additional 136 million tons of aluminum is possible. Development of this deposit could represent one of the most significant mining developments in this part of the state since the late 1800s.

Earth Science, Inc., has been interested in the alunite deposit on Red Mountain for many years. Under the regulations pertaining to mineral leasing, the company was issued a prospecting permit in 1974 and an extension of that permit in 1976. An application for a preference right lease was filed in 1978 and the initial showing required by regulation was filed in 1979. The initial showing was approved by the U.S. Geological Survey (USGS) in 1981 and lease issuance is pending. Specific analysis of this action would be the subject of an environmental analysis or environmental impact statement at a time when a specific proposal is made.

Other areas within the WSA which show potential mineralization include the ring fault of the caldera itself, which essentially circumscribes the WSA, radial fracture patterns around the perimeter of the WSA, particularly on the north and east sides, intra-caldera veins and fractures and large areas exhibiting hydrothermal alteration in the vicinity of Cooper Creek, Lee Smelter Gulch, Alpine Gulch, Red Mountain, Redcloud Peak, and Sunshine Peak.

The presence of patented mining claims within the boundaries of the WSA implies that at least at the time of patent, the economic conditions were such that a viable mineral deposit could be demonstrated on those properties. There are 25 such parcels of private land within the WSA and hundreds of others outside, but in close proximity.

Unpatented mining claims, duly recorded with the BLM according to the provisions of the Federal Land Policy and Management Act and 43 CFR 3833, cover more than 50 percent of the total area of the WSA (see Appendix 3.8). Although the act of staking a claim does not necessarily mean the physical existence of an economic minerals deposit, the presence of over 900 claims within this WSA is evidence of the mineral potential of the area.

The high potential areas, approximately 55 percent of the WSA, are located along the northern edge, in the Silver and Cooper Creek drainages and around Red Mountain. The southeast portion of the WSA (about 15%) has low potential. The remaining area (30%) has moderate mineral potential. The mining claims are spread throughout the WSA although they are more concentrated in the high potential zones.

Exploration of the mineralized areas, other than the Red Mountain deposit, is still in the preliminary stages of surface sampling and mapping. No clearly identified areas for intensive exploration have been defined, but the indications from initial exploration are that anomalous concentrations of numerous elements are present. Elements showing potential for economic concentrations are: gold, silver, copper, lead, zinc, arsenic, beryllium, thorium, titanium, vanadium, fluorine, and molybdenum.

A report entitled "Geochemical and Geostatistical Evaluation, American Flats-Silverton Planning Units" (USGS Open-file Report OF-599), was prepared following an extensive surface sampling and analysis program completed in 1979. The areas identified by this study show evidence of typical sulfide mineralization associations, copper, lead, zinc, gold and silver, and in some instances anomalous concentrations of uranium and molybdenum. This report concluded that certain areas of the Redcloud Peak Area have indications of minerals that would warrant further investigation. These areas specifically are Red Mountain, Grassy Mountain, Redcloud Peak, Sunshine Peak, Alpine Gulch, and Williams Creek. Other areas determined by this study to merit further investigation are on the periphery of the study area. These areas are Golden Fleece Mine, just outside the eastern boundary; the Fenny Fern Mine, at the northeast corner of the area; Capitol City, at the northwest corner; and Burrows Park, at the southwest corner. These area were selected by sample analysis and favorable geologic associations or structures.

Other studies in the area by BLM personnel, and data supplied by mineral exploration companies indicate strong anomalies of uranium, molybdenum, beryllium, and copper in samples from the drainage basins of Cooper Creek, Silver Creek, Lee Smelter Gulch, Owl Gulch, and Alpine Gulch. All of these areas are heavily staked with mining claims by several mining companies.

HANDIES PEAK

Topography

This area is very steep and mountainous. The elevation varies from 9,500 feet to 14,000 feet. Stream drainage patterns are dendritic and trellis, and the stream gradients are extremely steep. A sharp ridge in the western part of the unit is the drainage divide between the Animas River and Gunnison River drainage basins. The area contains several alpine lakes in the headwaters of perennial streams.

Soils

The Handies Peak WSA consists of three primary soil associations (see Map 3-2). The lower elevation peripheries consist primarily of the Cryoboralfs-Rock Outcrop association. The core of the WSA and higher elevations consist of the Rock Outcrop-Cryumbrepts-Cryaquepts and Rock Outcrop associations.

Water Resource

This study area drains into the Lake Fork of the Gunnison River in the Gunnion River drainage basin. A limited amount of water quality data is available for this area, but it appears the chemical quality of the surface water is generally good. However there is no information on concentrations of toxic metals in the waters of this area, and such metals are found in high concentrations in some of the surface waters in this vicinity. Because of wildlife, grazing, and recreation use, it is possible there may be contamination of surface waters by fecal pathogens.

The domestic water supply for the town of Lake City is furnished by two wells which tap groundwater. The watersheds of the Handies Peak and Redcloud Peak WSAs are partially responsible for the recharge of this groundwater supply.

Vegetation

Vegetation on the lower slopes of this WSA is mostly the Engelmann spruce-subalpine fir forest type, with occasional aspen groves. The higher elevations are mostly alpine tundra, consisting of high-altitude species of grasses, forbs, and shrubs. Some portions of the areas above timberline are steep, rocky, and devoid of vegetation.

Terrestrial Wildlife

This area has been identified as containing substantial amounts of summer range for an estimated 13 bighorn sheep and 89 elk. In addition to the summer range, 36 bighorn sheep are reported to winter on the Lake Fork of the Gunnison River, Cataract Gulch, and Boulder Gulch. A few elk are reported to use the area during the winter from near the confluence of Cottonwood Creek and Lake Fork of the Gunnison River downstream past the boundary of the WSA near Mill Creek Campground.

Aquatic Wildlife

There are approximately 14 miles of Lake Fork of the Gunnison River associated with this WSA. According to the Gunnison Basin Grazing EIS, both the aquatic habitat quality and productivity are in fair condition. There are no intensive inventory data available on the other major tributaries within the WSA (approximately 15 miles). However, Cottonwood Creek appears to have some good aquatic habitat but is low in productivity. According to DOW data, Cataract Creek is an intermittent tributary with no fishery value. In general, the other tributaries associated with this WSA have poor water quality resulting from heavy metal pollution from either natural levels or heavy metals in the soils or from past mining activity.

Wilderness Resource

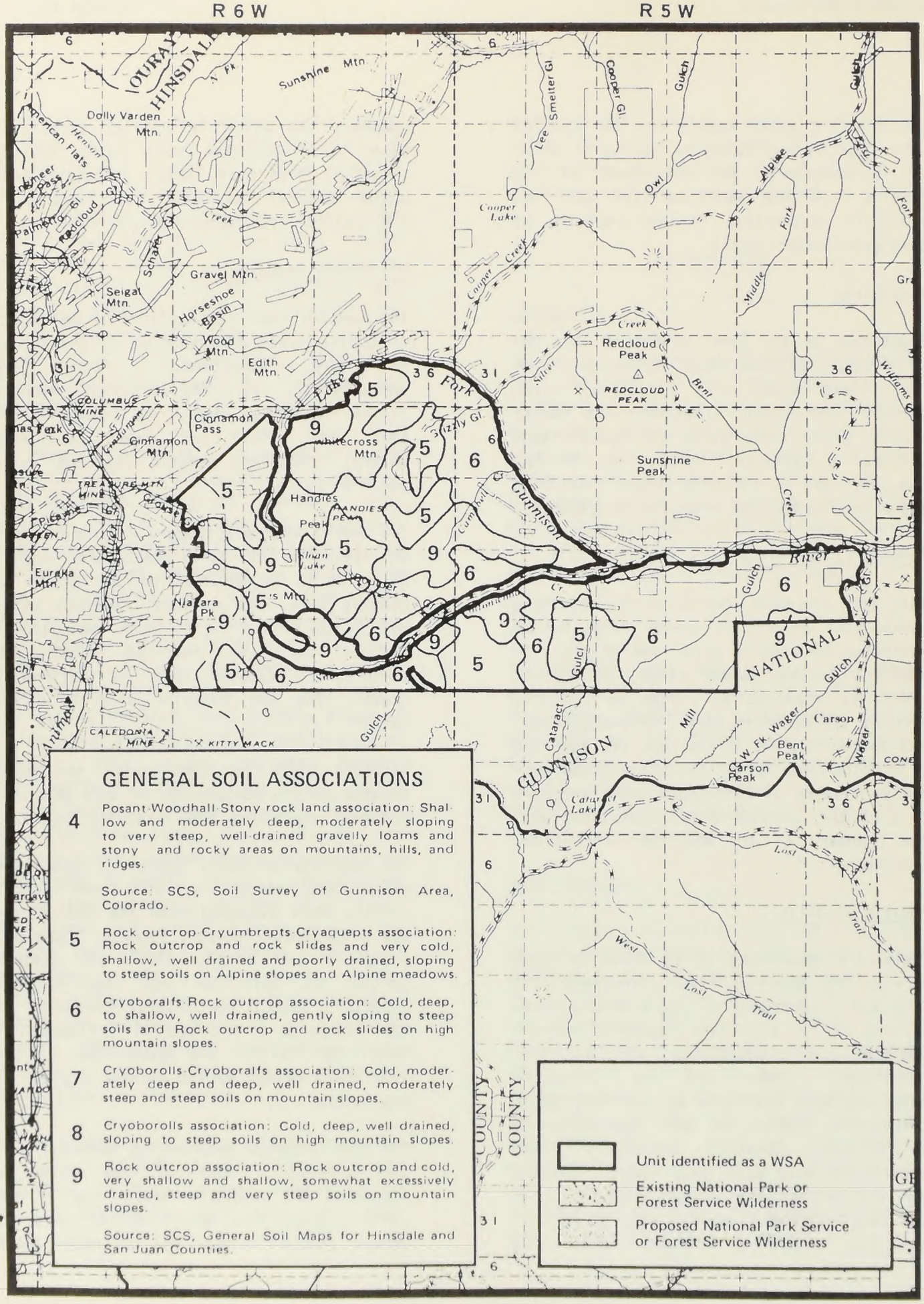
The Handies Peak WSA contains 18,860 acres of public lands administered by the Bureau of Land Management. There are approximately 170 acres of private mineral patent inholdings within the boundaries of this WSA. There are some state-owned mineral inholdings between Cataract Gulch and Mill Gulch.

The WSA is extremely rugged and ranges from an elevation of 9,400 feet near Wagner Gulch up to 14,048 feet on the summit of Handies Peak. It contains numerous peaks and ridges above 13,000 feet and glacial cirques such as American Basin and steep-walled canyons such as Cottonwood Creek. The WSA contains several alpine lakes.

Although there are some spruce and aspen forests on the peripheries of this WSA, the dominent vegetative type is alpine tundra.

The majority of man's imprints, associated with past mining activity and access routes, were excluded from the WSA during the wilderness inventory process. Some old prospects are found within the western portion of this WSA but they do not adversely impact the natural character of the landscape. The overall influence of human imprints on the naturalness of the area as perceived by the average visitor is negligible.

The WSA contains outstanding opportunities for solitude. Much of the area is comprised of mountain peaks and ridges above 13,000 feet which divide numerous remote glacial cirques and drainages, each



GENERAL SOIL ASSOCIATIONS

4 Posant-Woodhall-Stony rock land association: Shallow and moderately deep, moderately sloping to very steep, well-drained gravelly loams and stony and rocky areas on mountains, hills, and ridges.

Source: SCS, Soil Survey of Gunnison Area, Colorado.

5 Rock outcrop-Cryumbrepts-Cryaquepts association: Rock outcrop and rock slides and very cold, shallow, well drained and poorly drained, sloping to steep soils on Alpine slopes and Alpine meadows.

6 Cryoboralfs-Rock outcrop association: Cold, deep, to shallow, well drained, gently sloping to steep soils and Rock outcrop and rock slides on high mountain slopes.

7 Cryoborolls-Cryoboralfs association: Cold, moderately deep and deep, well drained, moderately steep and steep soils on mountain slopes.

8 Cryoborolls association: Cold, deep, well drained, sloping to steep soils on high mountain slopes.

9 Rock outcrop association: Rock outcrop and cold, very shallow and shallow, somewhat excessively drained, steep and very steep soils on mountain slopes.

Source: SCS, General Soil Maps for Hinsdale and San Juan Counties.

0 1 2 3 4 5 Miles

MAP 3-2

offering varying degrees of opportunities for solitude. The majestic view of surrounding mountains from within this WSA provides a feeling of spaciousness. The lower elevations and drainages with their dense aspen and spruce stands provide opportunities for seclusion and intimacy. The area's diversity encourages a freedom of movement within its boundaries.

The majority of the northern boundary of the WSA parallels the Shelf/Cinnamon Pass Road. Due to the steepness of terrain along this road as well as the "cherry-stemmed" Cottonwood Creek Road the sights and sounds of vehicle use are not impairing to the wilderness values.

The WSA, combined with its relatively large size, diversity, and ruggedness of terrain, offers outstanding opportunities for primitive and unconfined recreation. The numerous peaks, including Handies Peak at 14,048 feet, provide excellent hiking and climbing opportunities. The glacial cirques and drainages and numerous lakes facilitate recreational activities such as backpacking, camping, and fishing. Wildlife viewing and hunting are also activities which occur in this WSA.

Handies Peak (14,048 feet) is the 40th highest mountain in Colorado and is the highest within Bureau of Land Management jurisdiction, excluding Alaska. In 1874, members of the Hayden Survey climbed Handies Peak. At an elevation of 13,500 feet they found prospect holes and concluded that miners had preceded them to the top. Early Forest Service maps referred to this peak as "Tobasco". The early historian H. H. Bancroft reported that Handies was named after a prominent pioneer of the area (Bueler 1974).

The area is high in educational and scientific study potential. Intermingled volcanic and Precambrian rock types and glacial geomorphology are highly evident. At the head of American Basin is a rock glacier. The combination of mountainous landforms, multi-colored rock strata, diverse vegetation, and vast, open vistas produces outstanding scenic qualities.

The WSA has both winter and summer range for bighorn sheep. There have been some sighted mountain goats in the southern portion of the WSA. Ptarmigan and blue grouse can be seen. Elk and mule deer use the area during the summer. Limited amounts of elk winter range also exist in the vicinity of the Cottonwood Creek and Lake Fork confluence.

Cultural Resource

Handies Peak study area contains one identified historic mining related district, American Basin. This site is not considered to be eligible for listing on the National Register of Historic Places (NRHP).

Lands and Access

Handies Peak study area is approximately 18,860 acres of public lands under the jurisdiction of the Bureau of Land Management.

The State of Colorado owns the mineral estate of three parcels of land wtihin the study area described as:

T.42N., R.5W., N.M.P.M.

Section 16, 40 acres

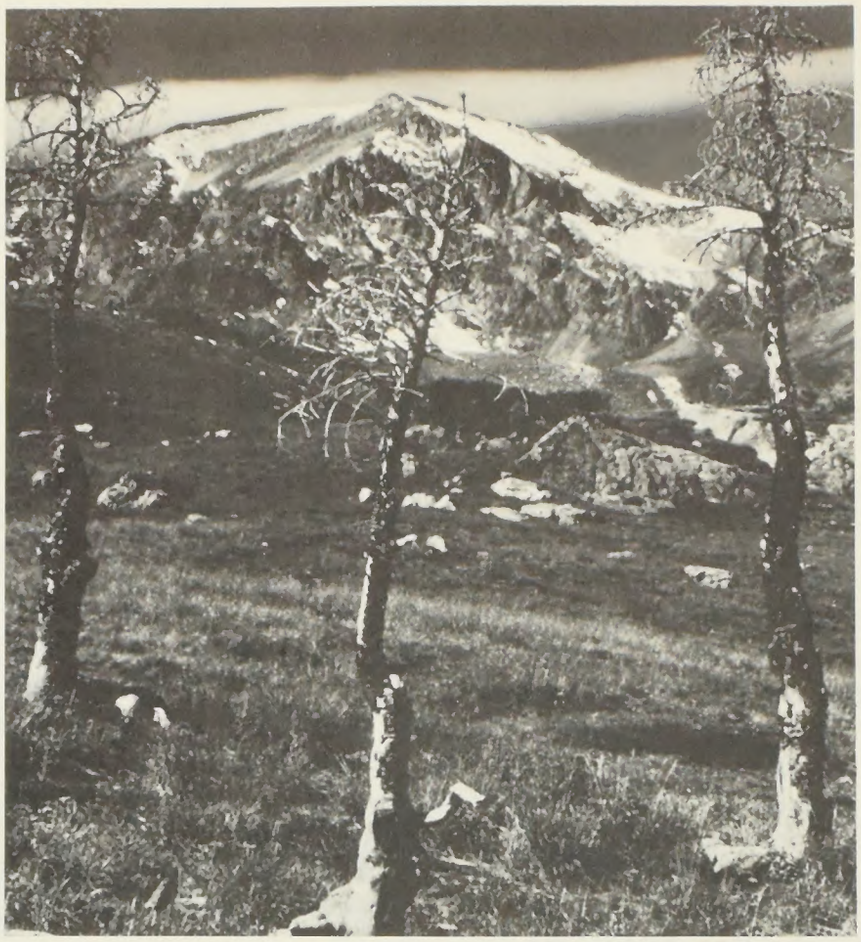
T.42N., R.6W., N.M.P.M.

Sections 9 and 16, 160 acres

T.43N., R.6W., N.M.P.M.

Sections 35 and 36, 400 acres

These lands aggregate about 600 acres, most of which has been leased to individuals or mining companies for mineral exploration.



Handies Peak viewed from Grizzley Gulch; Handies Peak WSA

View looking west up Cottonwood Creak; Handies Peak WSA

There are 13 parcels of private lands within the study area aggregating 170 acres. All these lands are patented mining claims. These 170 acres are not part of the WSA.

Legal access to the WSA is provided by the county road along the Lake Fork and two trail easements in the area. There is a withdrawal for the protection of recreation values along the Lake Fork of the Gunnison River.

Livestock Grazing

There are portions of five grazing allotments within the area. A total of 1,259 AUMs are authorized. The area is grazed by sheep from early July to the first of October. No major range improvements are proposed.

Forestry

There are 3,593 acres of Engelman spruce-subalpine fir forest type and 557 acres of aspen within the study area. The total volume capable of management on a sustained-yield basis is 8,492 thousand board feet (MBF), or 58 MBF/year. Under current multiple use management constraints, the area is not subject to intensive forest management and no timber sales are permitted.

Recreation

The Handies Peak WSA with its expanse of alpine tundra, scenic peaks, diverse canyons, rugged ridges and mountain lakes provides an excellent setting for a variety of recreation opportunities. Activities presently occurring in the area include the viewing of scenery, hiking on and off trails, horseback riding, backcountry camping, hunting, fishing, mountain climbing, photography, nature study, and rockhounding.

There are six primary trails in the unit. The American Basin trail is a popular route to Handies Peak (14,048 feet) which passes scenic Sloan Lake. The Grizzly Gulch trail is the most popular route to Handies Peak based on the position of the trailhead which is very near the Silver Creek trailhead. This allows mountain climbers to camp at the trailheads, hike to Redcloud and Sunshine Peaks on one day then hike to Handies Peak the next day. A trail up Boulder Gulch is used occasionally as an alternate route to Handies Peak. Snare Creek is not often used by recreationists but offers access to a remote area of tundra lakes. The trails in Cuba Gulch and Cataract Gulch are managed jointly with the Forest Service and provide access to National Forest lands near the Continental Divide. These trails are often used by big game hunters in the fall.

The Colorado Outward Bound School has used this WSA each summer since 1970 for cross country backpacking expeditions. Their use each season varies from 300 to 600 Recreation User Days (RUDs). Other than that, no accurate use figures for the area are available as no trail registers exist and the WSA is patrolled only sporadically by a backcountry ranger. The Colorado Mountain Club maintains a peak register on Handies Peak which recorded 1,200 climbers from 1970 to 1980. However, since not all hikers reach the peak and not all who reach the peak sign the register, visitor use is expected to be much higher. The Forest Service estimates use on the Cataract and Cuba Gulch trails together equals about 4.3 visitors per day over a 120 day use season which equals about 516 RUDs. Based on all the available data, recreation use in the Handies Peak WSA is estimated at 4,000 RUDs. This is estimated to be increasing by about 5 percent annually.

Minerals

Handies Peak WSA is adjacent to the highly productive Eureka Mining District, which has been responsible for total production of $79 million in zinc, lead, gold, silver, and copper. The geology of the Handies Peak area is similar to the productive area of the Eureka District, both being a part of the San Juan/Lake City caldera complex. The system of mineral bearing veins from which the precious and base metals of the surrounding areas were extracted also occurs within this WSA. Geophysical measurements and geochemical sampling indicate potential within the WSA for the occurrence of base and precious metal deposits, as well as anomalous concentrations of such elements as molybdenum, uranium, and nickel.

Exploration of the mineral deposits within this WSA is in the preliminary stages and more intensive exploration is needed to determine quality and quantity of the resource.

The existence of mining claims within the WSA does not necessarily imply economic mineral deposits, but it is an indication of interest in the mineral resource. There are about 200 mining claims within Handies Peak WSA, mostly in the western portion of the area, north and west of Cottonwood Creek (see Appendix 3.8).

The high mineral potential areas, approximately 40 percent of the total, are located in the western end and northeast edge of the WSA. The east and southeast portion of the WSA, mostly south of Cottonwood Creek and the Lake Fork, has low mineral potential. The moderate potential area which totals about 25 percent of the area is located in the central portion of the WSA.

Information provided by mining claimants indicate a very strong potential for economic deposits of base and precious metals (gold, silver, copper, lead, zinc) in the area of Snare Creek drainage. A fairly extensive drilling program in this area has delineated an ore body which shows a significant tonnage of ore, estimated at 750,000 tons of ore-grade material carrying good value of base and precious metals. Another area showing extensive mineralization is the caldera ring-fault system in the vicinity of Campbell Creek and Grizzly Gulch, where mineralization is associated with the intrusion of diabase dikes along the caldera wall. This occurrence has been shown to contain high values of molybdenum and silver in select samples of vein material and dump samples from old mining properties in the area. There are also indications at this location of nickel and cobalt mineralization. In the area of American Basin, which was historically mined for gold and silver, there are indications of some occurrences of nickel and cobalt minerals. This information is substantiated by the recent geochemical evaluations, which describes a nickel anomely in the vicinity of Handies Peak, just east of American Basin.

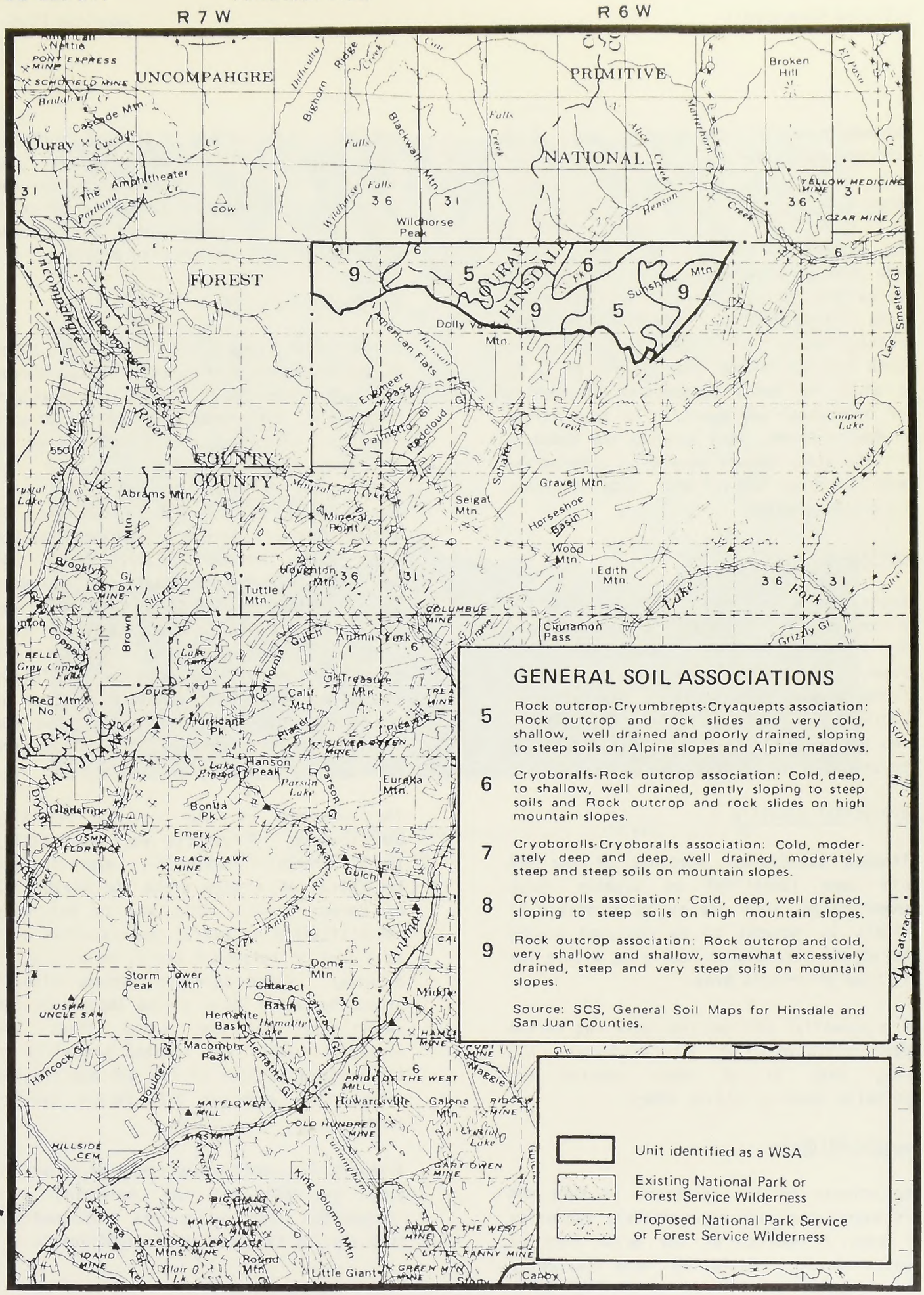
AMERICAN FLATS

Topography

This area is approximately 7 square miles of mountainous topography with elevations between 11,000 and 13,000 feet. Stream drainages include the North Fork of Henson Creek and other tributaries to Henson Creek plus the headquarters of Cow Creek which is tributary to the Uncompahgre River. All streams are a part of the Gunnison River drainage system.

Soils

The American Flats WSA consists of three soil associations (see Map 3-3). The majority of the area consists of Rock



GENERAL SOIL ASSOCIATIONS

5 Rock outcrop-Cryumbrepts-Cryaquepts association: Rock outcrop and rock slides and very cold, shallow, well drained and poorly drained, sloping to steep soils on Alpine slopes and Alpine meadows.

6 Cryoboralfs-Rock outcrop association: Cold, deep, to shallow, well drained, gently sloping to steep soils and Rock outcrop and rock slides on high mountain slopes.

7 Cryoborolls-Cryoboralfs association: Cold, moderately deep and deep, well drained, moderately steep and steep soils on mountain slopes.

8 Cryoborolls association: Cold, deep, well drained, sloping to steep soils on high mountain slopes.

9 Rock outcrop association: Rock outcrop and cold, very shallow and shallow, somewhat excessively drained, steep and very steep soils on mountain slopes.

Source: SCS, General Soil Maps for Hinsdale and San Juan Counties.

Unit identified as a WSA

Existing National Park or Forest Service Wilderness

Proposed National Park Service or Forest Service Wilderness

0 1 2 3 4 5 Miles

MAP 3-3

Outcrop-Cryumbrepts-Cryaquepts and Rock Outcrop associations.

Water Resource

The eastern portion of this area drains into Henson Creek and the Western portion drains into the Uncompahgre River via Cow Creek. Both are in the Gunnison River drainage basin. Water quality data for the North Fork of Henson Creek indicates it is suitable for human consumption if treated for biological pathogens. The main stream of Henson Creek, just outside the boundary of this area, showed levels of cadmium and lead exceeding federal and state standards for drinking water.

Vegetation

Vegetation on the lower slopes of this WSA is mostly the Engelmann spruce-subalpine fir forest type, with occasional aspen groves. The higher elevations are mostly alpine tundra, consisting of high-altitude species of grasses, forbs, and shrubs. Some portions of the areas above timberline are steep, rocky, and devoid of vegetation.

Terrestrial Wildlife

Although substantial portions of the WSA have been identified as bighorn sheep summer range, most use by an estimated 11 animals is thought to be centered around the adjacent Wildhorse Peak area within the Big Blue Wilderness Area.

Of a potential 289 species occurring in the upper elevations of the Wilderness EIS area, only 37 of these species are typically found in alpine areas.

Aquatic Wildlife

The primary aquatic resources in this WSA are associated with approximately two miles of aquatic habitat on the North Fork of Henson Creek. Based on data currently available, this stream is in good condition in terms of aquatic/riparian habitat. The natural productivity appears to be low and the fishery, consisting primarily of brook and rainbow, is supplemented by Colorado Division of Wildlife stocking programs.

Wilderness Resource

The American Flats WSA contains 4,710 acres of public lands administered by the Bureau of Land Management. The northwestern boundary is contiguous with the 97,350 acre Big Blue Wilderness Area administered by the Forest Service.

The majority of the WSA is comprised of alpine tundra. Several drainages radiate from Dolly Varden (12,932 feet) and Sunshine (13,321 feet) Mountains, including the headwaters of the North Fork of Henson Creek. Areas within the WSA below tree line are forested in spruce and aspen. A large portion of the unit is undulating topography with vast, unobscured vistas of the surrounding mountain lands. The WSA includes American Lake and several unnamed ponds.

The imprints of man are substantially unnoticeable. A vehicle way, essentially two tracks, extends approximately two-thirds of a mile along the North Fork of Henson Creek. This way is naturally rehabilitating in places and is often used as a foot or horseback trail, or as a stock driveway. Other imprints include mineral prospects which have a low impact on the naturalness of the area. Foot and horseback trails are located primarily in the western portion of the WSA and provide access into adjacent U.S. Forest Service lands.

Although the vehicle way could be separated from the WSA and the remaining area recommended for wilderness designation, this imprint is minor and insignificant.

View from Engineer Pass into the American Flats WSA and the Big Blue Wilderness Area

Only in combination with the Big Blue Wilderness Area could the American Flats WSA be considered to contain outstanding opportunities for solitude. The area's rolling, open alpine tundra does not provide for either vegetative or topographic screening, but the western portion readily combines geographically with the existing Big Blue Wilderness Area.

The alpine tundra vegetation of the area allows unconfined movement and recreation, but only in combination with the high scenic quality of the mountainous landscape and outstanding recreation opportunities found within the adjacent Big Blue Wilderness Area. The scenic values of the WSA are enhanced due to its alpine tundra and adjacent 13,000 and 14,000 foot peaks.

In 1874 members of the Hayden Survey, after climbing Uncompahgre Peak, crossed the undulating plateau of American Flats to its western edge above the gorge of the Uncompahgre River. It was here they studied the possibilities of climbing Mount Sneffels. From American Flats they then headed in the direction of the Lake Fork Mountains and there ascended Redcloud Peak, Sunshine Peak, and Handies Peak.

The area has blue grouse; Rocky Mountain bighorn sheep and mule deer can be seen in the summer. Ducks and geese are common at American Lake. The North Fork of Henson Creek has been identified as potential river otter habitat, but to date there are no known residents in the area.

Cultural Resources

There are numerous historic mining-related structures outside the boundaries of this area, but none have been identified within the area.

Lands and Access

This area is approximately 4,710 acres of public land. No parcels of private land are included within the WSA boundaries. Section 16, described by suspended survey, was originally granted to the State of Colorado as a "school section." The surface estate of this land was later reconveyed to the United States, reserving the mineral estate to the State of Colorado. A 10-acre portion of this state-owned mineral estate falls within the boundaries of the study area in what is now described by protraction diagram as Section 9; T.43N., R.6W., N.M.P.M.

Livestock Grazing

Two grazing allotments are located partly within this study area with a total of 353 AUMs. The area is grazed by sheep from early July to the first of October. Intensive management is proposed for these allotments, which would rotate grazing cycles, season of use, etc. No major range improvement projects are proposed.

Forestry

Timber occurs only in the very lowest portions of this area. Most of the area is above timberline. Forest cover occurs on 178 acres and is mainly Engelmann spruce. Of this, 83 acres is withdrawn by timber production capability classification. The "no-problem" classification amounts to 95 acres containing 855 thousand board feet with a potential sustained yield volume of 8 MBF/year.

Recreation

The American Flats WSA with its expanse of alpine tundra, scenic lakes, wildlife and breathtaking views provides an excellent setting for a variety of recreation opportunities. Activities presently occurring in the area include the viewing of scenery, hiking, backpacking, horseback riding, camping, hunting, and photography.

There are three primary trails that provide access to the WSA. The old road that leads north from near Engineer Pass is closed to vehicles but offers access to hikers and horseback riders. A fork of the popular Bear Creek trail leads into American Lake from the west. The U.S. Forest Service which manages the majority of this trail estimates use to be about 65 hikers per week for an 18 week season. Only about 10% of these users go as far as American Flats. The Horsethief trail enters from the northwest and traverses the length of the WSA. This trail, while used some in the summer, is most popular during the hunting season. The Forest Service estimates use to be about 33 users per week for a 16 week season.

The Colorado Outward Bound School has used this area each summer since 1970 with approximately 50 to 150 user days each season.

No accurate data exists on the overall recreation use in the WSA, however, based on the data that is available use is estimated to be 1,500 RUDs annually. This use is estimated to be increasing by about 5 percent annually.

Minerals

This study area is located within the Uncompahgre Caldera complex adjacent to the Eureka graben, where many mining operation contributed to the production of precious and base metals in the late 1800s and early part of the 20th Century. In areas immediately adjacent to the WSA, which were eliminated from further wilderness consideration during the intensive inventory phase, exploration is occurring on both public and private land. Within the boundaries of the WSA, exploration to date has consisted of preliminary surface sampling and mapping. The areas of potential mineralization as indicated by assay samples, geologic structure, rock type, and location of unpatented mining claims, include the North Fork of Henson Creek drainage, Dolly Varden Mountain, and the southeastern portion of the WSA, including Sunshine Mountain. There is evidence of the occurrence of the mineralized vein systems in these areas similar to the adjacent areas which were mined in the past. In addition to precious and base metals potential, the area of Dolly Varden Mountain has been shown through geochemical and geophysical evaluation to have potential for having economic concentrations of uranium.

The presence of mining claims is not, by itself, necessarily indicative of mineralization. However, it does indicate an interest in the mineral potential when taken in context of the geologic parameters indicating areas of possible mineralization. In this area about 40 mining claims, as recorded with the BLM, are located in the area of Dolly Varden Mountain, North Fork of Henson Creek, and Sunshine Mountain. These generally coincide with the high and moderate potential areas (see Appendix 3.8).

BILL HARE GULCH

Topography

This area is about 370 acres of steep terrain dissected by several small streams, the headwaters of which originate in the National Forest lands to the west. Elevation varies from 8,700 to 9,300 feet. Stream drainage patterns are dendritic.

Soils

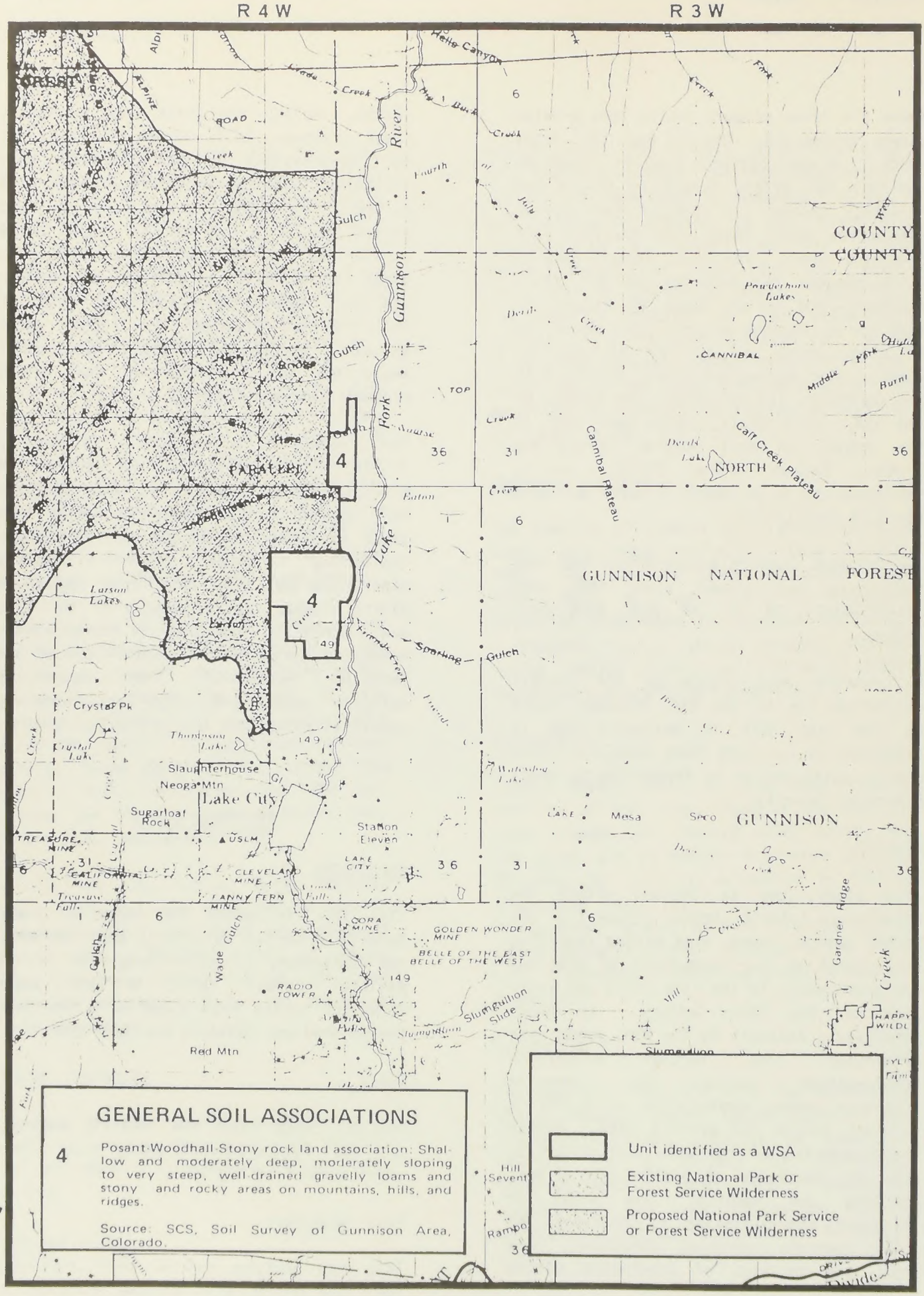
The Bill Hare Gulch WSA consists entirely of the Posant-Woodhall-Stony rock land association (see Map 3-4).

Water Resources

This area contains several small drainages which are tributary to the Lake Fork of the

CO-030-085
CO-030-086

Bill Hare Gulch
Larson Creek



GENERAL SOIL ASSOCIATIONS

4 Posant-Woodhall-Stony rock land association: Shallow and moderately deep, moderately sloping to very steep, well-drained gravelly loams and stony and rocky areas on mountains, hills, and ridges.

Source: SCS, Soil Survey of Gunnison Area, Colorado.

- Unit identified as a WSA
- Existing National Park or Forest Service Wilderness
- Proposed National Park Service or Forest Service Wilderness

N

0 1 2 3 4 5 Miles

MAP 3 - 4

Gunnison River. No water quality data is available, but because of recreational and wildlife use, the surface waters could be contaminated by fecal pathogens.

Vegetation

The dry, lower slopes of this area are forested with ponderosa pine, and the higher areas have Douglas-fir on the rocky, steep slopes. Some willows and shrubs occur along the drainages. Very little understory or meadow areas occur within this area.

Terrestrial Wildlife

This WSA is an extension of crucial mule deer and elk winter range which extends from the adjacent Big Blue Wilderness Area. The area within the WSA is capable of providing winter forage for the equivalent of one mule deer and one elk.

Aquatic Wildlife

There is approximately 0.5 mile of intermittent aquatic habitat associated with this WSA. Based on DOW data this tributary has no fishery value. There is currently no existing data available that would indicate the value of this tributary to other aquatic organisms.

Wilderness Resource

The Bill Hare Gulch WSA contains 370 acres of public lands administered by the Bureau of Land Management. The western boundary of this WSA is contiguous with the 97,700 acre Big Blue Wilderness Area administered by the Uncompahgre National Forest.

Bill Hare Gulch WSA contains the lower portion of five gulches which originate within the Big Blue Wilderness Area. The terrain includes steep slopes and small forested and rocky knobs. Vegetation is aspen and conifers with oakbrush and other shrubs along the stream drainages.

Only an extremely small portion of the WSA contains imprints of man. These imprints are substantially unnoticeable. A foot and horse trail crosses this area and provides access into the Big Blue Wilderness Area. Portions of an old ditch are found in Bill Hare Gulch and extends into the Big Blue Wilderness Area. This ditch is substantially unnoticeable and is rehabilitating under natural processes. The overall influence of human imprints on the naturalness of the area as perceived by the average visitor is negligible.

Only in combination with the Big Blue Wilderness Area would the Bill Hare Gulch WSA be considered to contain outstanding opportunities for solitude. Although small in size, this WSA contains steep hills, rocky outcrops, and narrow canyons and is fairly heavily forested which tends to screen visitors from one another. Although the Bill Hare Gulch WSA lies just west of Highway 149, the WSA is elevated well above the roadbed and thus sights and sounds of vehicles are not impairing to wilderness values.

Only in combination with the Big Blue Wilderness Area would the Bill Hare Gulch WSA or portions therein, be considered to contain outstanding opportunities for a primitive and unconfined type of recreation. It does provide access for foot and horse use to the Big Blue Wilderness Area.

Cultural Resource

The area contains no known historic or archeological sites.

Lands and Access

The area is public domain surface and mineral estate. Access to the area is provided off of Highway 149.

Larson Creek WSA

Eastern slope of Bill Hare Gulch WSA

Livestock Grazing

The area is not allotted for grazing due to the overall unsuitability for livestock grazing.

Forestry

The area has no identified timber potential.

Recreation

The Bill Hare Gulch WSA is contiguous to the 97,700 acre Big Blue Wilderness area. A primitive trail passes through the WSA and offers the only public access along the eastern boundary of the Big Blue. Recreation consists primarily of hunters who pass through the WSA on foot or on horseback to hunt in the Big Blue. This trail was established in 1985 and is not yet well known. It is expected that eventually a limited number of backpackers may use this trail in the summer to gain access to the Big Blue. No accurate use data is available because there are no trailhead registers nor is the area currently patrolled by a backcountry ranger. Total RUDs for 1985 are estimated 50. This will probably double as the trail become better known but will then level off.

Minerals

The area has no identified mineral resource potential.

LARSON CREEK

Topography

Elevation varies from 8,600 to 10,500 feet. Topography is steep, V-shaped drainages of the lower part of Larson Creek and its tributaries whose headwaters are located on National Forest land to the west.

Soils

The Larson Creek WSA consists entirely of the Posant-Woodhall-Stony rock land association (see Map 3-4).

Water Resource

Larson Creek is tributary to the Lake Fork of the Gunnison River within the Gunnison River drainage basin. No water quality data is available, but because of wildlife use, the surface waters could be contaminated by fecal patogens.

Vegetation

Vegetation consists of ponderosa pine in the lower elevations, Douglas-fir and Engelmann spruce-subalpine fir at the higher elevations. Some aspen stands are present in the area, with oakbrush and other shrubs along the drainages.

Terrestrial Wildlife

This WSA is an extension of crucial mule deer and elk winter range which extends from the adjacent Big Blue Wilderness Area. The area within the WSA is capable of providing winter forage for the equivalent of one or two mule deer and two elk.

Aquatic Wildlife

There is approximately one mile of aquatic habitat associated with this WSA. According to the data collected in the preparation of the Gunnison Basin Grazing EIS, the aquatic/riparian habitat associated with Larson Creek is in excellent condition with high aquatic productivity, but there is no data concerning any existing or potential fishery.

Wilderness Resource

The Larson Creek WSA contains 900 acres of public lands administered by the BLM. The northern and western boundary is contiguous

with the 97,700 acre Big Blue Wilderness Area administered by the Uncompahgre National Forest and consists primarily of the steep western slope of the Lake Fork of the Gunnison River Canyon. The upper portions are over 10,500 feet in elevation. Several deep, rugged side canyons cut across the WSA from west to east and enter the Lake Fork. The vegetation is fairly heavy and consists primarily of pine, spruce and aspen with some open areas.

Only a very small portion of the WSA contains imprints of man. These imprints are either substantially unnoticeable or may add to the cultural resource values of the WSA. Some old, uninhabited cabins within the unit appear to be associated with past mineral prospecting. The majority of these structures (approximately eight) have either collapsed or are deteriorating. A portion of a vehicle way enters the southern portion of the WSA but is effectively screened by the thick stands of aspen and spruce. This way is less than one mile in length. Some fencing is also found within the unit and is substantially unnoticeable. The overall influence of human imprints on the naturalness of the area as perceived by the average visitor is negligible.

Because of the small size of the Larson Creek WSA, only in combination with the Big Blue Wilderness Area would these lands be considered to contain outstanding opportunities for solitude. The WSA is very rugged in topography and heavily forested; thus, visitors would be screened from one another. Due to the steep slopes, only a minimal area along the eastern boundary would possibly be adversely affected by highway usage. The majority of the WSA would not be affected by either the sight or sounds of vehicles and thus would not be impairing to the wilderness values.

Only in combination with the Big Blue Wilderness Area would the Larson Creek WSA, or portions therein, be considered to contain outstanding opportunities for a primitive and unconfined type of recreation. The Larson Creek WSA could provide access into the existing Big Blue Wilderness Area.

Cultural Resource

No inventoried historic or archeological sites have been identified in this area, but several old cabins are known to exist along the main stream of Larson Creek.

Lands and Access

This area contains 900 acres of public domain surface and mineral estate. Legal access is by State Highway 149 along the eastern boundary. A telephone/telegraph right-of-way which parallels the highway is a portion of the southeastern boundary of the study area. A portion of Mineral Survey No. 99 falls within the northeast quarter of Section 15; this survey never went to patent.

Livestock Grazing

The area is currently unallotted for livestock grazing.

Forestry

Forest cover occurs on 566 acres in the WSA and consists of ponderosa pine on the lowest portions of the area and Douglas-fir and Engelmann spruce-subalpine fir at the higher elevations. Of the total forested area, 487 acres are withdrawn by timber production capability classification. The remaining 79 acres, classified "no problem", contains 540 thousand board feet with a potential sustained yield volume of 6 MBF per year.

Recreation

The Larson Creek WSA is contiguous to the 97,700 acre Big Blue Wilderness area. Current recreation use is very light and consists primarily of hunters which may wander into the area from camps within the Big Blue. No adequate access exists from State Highway 149 and no developed trails exist in the area. No accurate user data is available but total RUDs for 1985 are estimated to be 20.

Mineral Resources

The Larson volcanic center, which was one of the earliest centers of volcanic activity in this portion of the San Juan Mountains Province, is located within this area. This activity predates the cycle of caldera collapse and resurgence which has been linked to the ore emplacement of the mineralized areas to the south. This area does contain some rhyolitic and andesitic dikes radiating from the volcanic center, and the area exhibits hydrothermal alternation, but there is very little evidence that the area has any significant mineral potential. There is some evidence of prospecting activity in the vicinity of one of the dikes, but no mining claims have been recorded with the BLM.

An informal report by the Los Alamos Scientific Laboratory entitled "Multisource Data Set Integration and Characterization of Uranium Mineralization for the Montrose Quadrangle, Colorado", indicates anomalous sulfide mineral concentrations in this area.

ASSUMPTIONS

Certain assumptions and guidelines have been applied in order to facilitate the environmental impact discussions.

1. Short term impacts, for the purpose of analysis, are those that will occur within five years after designation/non-designation. Long term impacts are those that would occur more than five years after designation.

2. If an area is not designated wilderness it will be managed according to the existing Gunnison Basin and American Flats-Silverton MFPs or the San Juan-San Miguel Resource Management Plan. In addition, guidance on this area is contained in the American Flats and Silverton Recreation Area Management Plan.

3. If an area is designated wilderness, the BLM's Wilderness Management Policy would provide management guidance.

4. Valid existing mining claims can be mined within a designated wilderness area as long as there is no unnecessary or undue degradation. All existing claims on the date of designation would undergo a validity examination before any plan of operation would be approved.

5. If designated wilderness no new mining claims could be staked or filed.

6. With the exception of the Red Mountain alunite deposit few site specific mineral evaluations have been conducted in any of the WSAs. Mineral development scenarios have been developed using the best available data and provide the basis for the impacts identified in this chapter. It must be understood that the scenarios and resultant impacts are used to provide a means of comparing the relative impacts of implementing any of the alternatives and should not be considered as management proposals.

7. In the Redcloud Peak, Handies Peak and American Flats WSAs there is an extensive amount of existing mining claims. It is assumed, given the large number of claims and the high potential of these areas for discovery, that a certain number of these claims would ultimately be found to have valid existing rights. Given the level and the location of mineral development expected to occur without designation, these valid rights are expected to be sufficient to allow this same level of development to occur with designation as well.

8. If the alunite development proponents successfully complete all the steps in the preference right lease process they will have a valid existing right that would allow development even with designation. However, until they complete that process there is no assurance that these steps will be successfully completed and that right obtained. This is discussed in detail in the "Alternatives Considered" section in Chapter 2.

Consequently, for the purposes of analysis, it was assumed that the Red Mountain alunite deposit would be developed in those alternatives in which Red Mountain was not recommended as suitable for wilderness designation. In those alternatives where Red Mountain was included in a suitable recommendation it was assumed that the alunite deposit would not be developed.

9. The BLM would be required to provide access for the reasonable use and enjoyment of patented claims and stated mineral lands within wilderness areas.

10. If an area containing state mineral lands or privately-owned lands is designated wilderness, acquisition of those private or state interests may occur through purchase or exchange. Acquisition

of non-public owned lands will occur only if the state or private owners concur with the acquisition, or if the acquisition is specifically authorized by Congress to be accomplished by eminent domain.

ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL

Implementation of any alternative would require motor vehicle and aircraft fuel for administration of the area. However, the amount would not be different for any alternative selected, and no conservation potentials are evident.

NON-AFFECTED RESOURCES

Several resources were discussed in Chapter 3, Affected Environment, that will not be affected by the various alternatives within any of the WSAs. These resources include topography, vegetation, forestry management, and livestock grazing.

Topography - Wilderness designation or non-designation would have no affect on the topography of any WSA.

Vegetation - There are no impacts to vegetation that would result from designation or non-designation of any WSA as wilderness. Although mining activity would have impacts on vegetation these are not expected to be affected by designation.

Forest Management - None of the WSAs are under intensive forest management so there would be no impact from wilderness designation or non-designation.

Livestock Grazing - The BLM's Wilderness Management Policy provides for the continuation of existing grazing practices. Although with designation operations would be more closely regulated, they would continue as they have historically. No developments are planned that would be affected by designation.

In addition to the above resources there are several others that would be affected only in the case of Redcloud Peak, Handies Peak, and American Flats WSAs. These are soils, water, terrestrial wildlife and aquatic wildlife. In the case of the other two WSAs no activities are predicted that would result in any different impacts to these resources with or without designation.

UNIT BY UNIT ANALYSIS

Redcloud Peak (CO-030-208)

Proposed Action (Conflict Resolution Alternative I)

Impacts on Wilderness Values

Wilderness values on the 30,400 acres recommended as suitable would receive the protection provided by wilderness designation. This includes 720 acres outside the WSA boundary. The existing natural values in this portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunity for climbing, hiking, camping, and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Within the area recommended as suitable, mineral developments are still projected to occur in Silver and Cooper Creeks as a result of valid existing rights. If this development takes place there would be a total surface disturbance of about 15 to 25 acres and 3 to 9 miles (5 to 15 acres) of road construction. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 2000 acres within these two drainages.

Designation would preclude further surface disturbing exploration activities. This would prevent the disturbance of 25-50 acres that would otherwise result from prospecting in the area.

Mineral development would eventually result in the loss of wilderness values on the 10,175 acres recommended as nonsuitable. Development of the alunite deposit on Red Mountain would directly disturb 425 acres and 3-4 miles for new road construction. In addition to the loss of wilderness values on the 425 acres directly affected, the noise and visual impacts associated with a mine of this magnitude would result in the loss of opportunities for solitude, primitive and unconfined recreation on all of the nonsuitable area located at the east end of the WSA. In addition, if the two mines projected on the northern edge of the WSA were developed, wilderness values in this area would also be lost. Continued prospecting would disturb 10 to 20 acres within the nonsuitable portion of the WSA. This will occur in the high potential area along the north and northeast edge of the WSA and would involve road construction and small excavations.

Conclusion: Although a total of 30,400 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 28,400. In addition, wilderness values would eventually be lost on 10,175 acres recommended as nonsuitable as a result of alunite mining and other small mineral operations.

Impacts on Mineral Resource Development

Subject to valid existing rights the 30,400 acres recommended as suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Of this approximately 18,000 acres have high potential for mineral discovery, 8,000 acres have moderate potential and 4,400 have low potential. This would preclude any continued surface disturbing exploration work not associated with valid existing rights. With the exception of the following projected mineral developments the mineral potential found in this portion of the WSA would be foregone and these minerals, primarily base and precious metals, would be unavailable for future generations.

Due to the large number of mining claims, existence of patented mining claims and the high potential for discovery of base and precious metals in the Silver and Cooper Creek drainages, valid existing rights are projected to exist in this area after designation. As a result of these rights an unquantified amount of base and precious metals are expected to be produced from three mines within the area recommended as suitable.

The 10,175 acres, recommended as nonsuitable would remain open to mineral entry. Expected development would include a large-scale alunite mine on Red Mountain projected to produce 4 million tons of ore (250,000 tons of aluminum) annually. Analysis of that project in a BLM draft EA indicated that the mine would generate 110 jobs and increase per capita income in Hinsdale County by nineteen percent by 2003. Two small underground mines south of Henson Creek are projected to produce an unquantified amount of base and precious metals.

Conclusion: The proposed action would withdraw 30,400 acres from mineral entry, subject to valid existing rights. Due to predicted valid existing rights development of three mines for the production of base and precious metals in the Silver and Cooper Creek drainages would still occur. The 10,175 acres recommended as

nonsuitable would remain open to mineral entry. Production of 4 million tones of alunite as well as an unquantified amount of base and precious metals from two mines would occur. Alunite development would create 110 jobs and increase per capita income in Hinsdale County by nineteen percent.

Impacts on Recreation Use

The 30,400 acres recommended as suitable would provide for the continuation of the existing hiking, hunting, camping, photography and mountain climbing activities. The use within this portion of the WSA estimated to be 4500 RUDs, is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles.

Access roads to projected mining operations in Cooper and Silver Creeks would not be open to motorized recreation use. Approximately 1000 RUDs of motorized recreation use that might otherwise occur would not be available.

Within the nonsuitable portion of the WSA development of the Red Mountain alunite deposit would change the existing primitive backcountry recreation setting to one dominated by roads and manmade intrusions. Overall use of 500 RUDs is expected to increase by about 5 percent annually. With development of the mine there would be some shift from the existing hiking, hunting and camping activities to motorized use.

Conclusion: The existing 4500 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur within the suitable areas. This use would increase by about 9 percent annually. The current 500 RUDs of use in the nonsuitable portion would increase by about 5 percent annually and shift toward motorized recreation.

Impacts on Soils

Soils would be disturbed and productivity lost on 15 to 25 acres and along 3 to 9 miles of road (about 5 to 15 acres) within the suitable portion of the WSA. In addition, soil would be disturbed on 2-3 acres as a result of 3 to 5 miles of trail construction in Bent Creek.

Preclusion of mineral exploration in the portion of the WSA recommended suitable would prevent soil disturbance on 25 to 50 acres that would otherwise result from prospecting activities.

Within the nonsuitable area alunite development projected to occur under this alternative would disturb 425 acres of soil as part of the mine and 35 acres from construction of access roads. Another 5 to 15 acres would be disturbed from mine development in the nonsuitable area along the northern edge of the WSA. Prospecting would disturb soil on an additional 10 to 20 acres. Soil productivity would be lost on all of these acres.

Conclusion: Within the suitable area soil would be disturbed and productivity lost on approximately 20 to 40 acres as a result of mineral development and trail construction. Disturbance of 25 to 50 acres from prospecting activity would be prevented. Soil would be disturbed and productivity lost on up to 495 acres from alunite and other development in the area recommended nonsuitable. Overall 515 to 535 acres would be disturbed.

Impacts on Water Quality

Designation of the 30,400 acres recommended

as suitable would generally have a beneficial impact by preventing surface disturbing activities that would otherwise degrade water quality. Development of three mines and associated access roads would result in some unquantified increase in sediment and heavy metal concentrating in Silver and Cooper Creeks. By precluding mineral exploration that would otherwise disturb 25 to 50 acres additional contamination of drainages throughout the suitable area would be prevented.

Development of alunite within the portion of the WSA recommended as nonsuitable would have the potential to degrade water quality in Alpine Gulch, East Alpine Gulch, Red Mountain Gulch and Wade Gulch. Contamination of these drainages from sediment and heavy metals could not only affect water quality in those drainages but also in Henson Creek.

Contamination of Henson Creek from two small mines on the northern edge of the WSA would also occur, although this impact is expected to be slight.

Conclusion: Degradation of water quality would occur in both the suitable and nonsuitable portions of the WSA. These would be concentrated in the Cooper and Silver Creek areas within the suitable portion. Alpine Gulch, East Alpine Gulch, Red Mountain Gulch, Wade Gulch and Henson Creek would be affected if alunite is developed in the nonsuitable portion of the WSA. Overall about 14 miles of stream would be affected.

Impacts on Wildlife

The primary impacts to wildlife, both terrestrial and aquatic, would occur in the nonsuitable portion as a result of alunite development. Development of the mine and access road would displace approximately 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Since winter range is the controlling factor for population numbers in this area there would be no impact on the number of animals. In addition, mining activity and development of the access road would result in increased sedimentation and heavy metal concentrations. This would result in an unquantified degradation of water quality and loss of aquatic habitat. Within that portion of the WSA recommended suitable development in the Silver and Cooper Creeks drainages is not expected to affect terrestrial or aquatic wildlife. This is primarily due to the fact that the mining operations would be small, no public access would be provided, the deer and elk populations in this area are small, and productive fish habitat is limited to the upper reaches of Cooper Creek. Habitat for about 20 bighorn sheep would be protected in the southern portion of the WSA. In addition deer and elk habitat would be protected on the 30,400 acres recommended suitable.

Conclusion: Development of the alunite deposit would displace 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Aquatic habitat in Alpine and East Alpine Gulch would be subject to degradation. Bighorn sheep, deer and elk habitat would be protected on the 30,400 acres recommended suitable.

All Wilderness Alternative

Impacts on Wilderness Values

Wilderness values on the entire 40,575 acres would receive the protection provided by wilderness designation. The existing natural values of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunity for climbing, hiking, camping

and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Even with designation patented mining claims and other claims with valid existing rights are still expected to result in the development of about five small underground mines in the WSA. Three of these would be in the Cooper and Silver Creek drainages and two would be located along the northern edge of the WSA. These would disturb approximately 20 to 40 acres directly. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 3000 acres. The Red Mountain alunite deposit would not be developed resulting in the continued protection of wilderness values on approximately 8000 acres that would have otherwise been lost. Designation would preclude surface disturbing exploration activity that would otherwise disturb 35 to 70 acres within the WSA.

> Conclusion: Although a total of 40,575 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could affect 3,000 acres and reduce the acreage on which wilderness values are actually preserved to 37,575.

Impacts on Mineral Resource Development

Subject to valid existing rights the entire 40,575 acres would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Of this approximately 22,000 acres have high potential for mineral discovery, 12,000 have moderate potential and the remaining 6,000 acres have low potential. This would preclude any further surface disturbing exploration work. With the exception of the following projected mineral developments, the mineral potential found in this WSA would be foregone and these minerals primarily base and precious metals, would be unavailable for future generations. The resultant economic loss is unquantifiable.

Valid rights are predicted to allow for the development of base and precious minerals from three small underground mines in the Silver and Cooper Creek drainages and two similar mines along the northern boundary of the WSA. The alunite deposit in the Red Mountain area is not projected to be developed under this alternative. Therefore, an estimated 4 million tons of ore (25,000 tons of aluminum) annually would not be produced and 110 jobs and an increase of nineteen percent in per capita income in Hinsdale County would not occur.

> Conclusion: Subject to valid existing rights 40,575 acres would be withdrawn from mineral entry and the mineral potential would be foregone. Surface disturbing exploration activity would be foregone. Development of 4 million tons of alunite ore annually would not occur. Additionally, an increase of 110 jobs and a nineteen percent increase in per capita income in Hinsdale County would not occur. Five small underground mines for the production of base and precious metals would result from valid existing rights.

Impacts on Recreation Use

The 40,575 acres recommended as suitable would provide for the continuation of the existing hiking, hunting, camping, photography and mountain climbing activities. The use in this WSA, estimated to be about 5000 RUDs, is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles.

Access roads to projected mineral developments in Cooper and Silver Creeks would not be open to motorized recreation use. Approximately 1000 RUDs of motorized recreation that might otherwise occur would not be available. This development would also result in the reopening of an access trail for Redcloud and Sunshine Peaks in Bent Creek. This would not change the amount of use but only the location.

Approximately 5 miles of trail would be developed in the Alpine Gulch vicinity. This would not result in an increase in recreation use but rather would allow for a greater dispersal of users.

Conclusion: The existing 5000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur. This use would increase by about 9 percent annually. Access to Redcloud and Sunshine Peaks would shift from Silver Creek to Bent Creek. New trails would provide better dispersion of recreationists in the Alpine Gulch area.

Impacts on Soils

Soil would be disturbed and productivity lost on 20 to 40 acres and along 3 to 9 miles of road (about 5-15 acres) associated with mineral development in Silver and Cooper Creeks and along the northern edge of the WSA expected to occur as a result of valid existing rights. Minor amounts of disturbance would result from trail construction in Bent Creek and Alpine Gulch. Disturbance of 35 to 70 acres from prospecting activity would be prevented.

Without the alunite development disturbance to 460 acres in Alpine Gulch and on Red Mountain would not occur. The soil productivity in the remainder of the WSA would be protected.

Conclusion: Disturbance and loss of productivity would occur on about 25 to 55 acres of soil from mineral development, access road construction and trail construction would occur. Designation would preclude disturbance to 35 to 70 acres from exploration activity and 460 acres from alunite development. Overall 25 to 55 acres would be disturbed.

Impacts on Water Quality

Designation of the 40,575 acres would have a beneficial impact on water quality by preventing surface disturbing activities such as mineral exploration that would otherwise degrade water quality. In addition, without alunite development degradation of the water quality in the Alpine Gulch, East Alpine Gulch, Red Mountain Gulch and Wade Gulch from sedimentation and heavy metal concentrations would not occur.

Mining activity associated with three mines in the Silver and Cooper Creek area would cause an unquantified increase in sedimentation and heavy metal concentrations in those drainages. A slight degradation of the water quality in Henson Creek may occur from development of 2 mines within the northern edge of the WSA.

Conclusion: Water quality would be degraded by mineral development in Silver and Cooper Creeks and along Henson Creek. Impacts to water quality associated with alunite development would not occur. About five miles of stream would be affected.

Impacts on Wildlife

Without alunite development, the 50 to 80 deer and 100 to 130 elk that would otherwise have been displaced would not be affected. Although there would be increases in recreation use and in some cases a relocation of that use due to trail

development, levels are not expected to be large enough to have any significant affect on wildlife habitat. Aquatic habitat would not be degraded from activities associated with alunite development as well. In the long term wildlife would benefit through protection of terrestrial and aquatic habitat on 40,575 acres.

Conclusion: Impacts to terrestrial and aquatic wildlife from alunite development would not occur in this alternative. Overall impact would be the long term protection to 40,575 acres of habitat and about 200 elk, 120 deer and 20 bighorn sheep.

No Wilderness Alternative

Impacts on Wilderness Values

None of the wilderness values in the WSA would receive the legislative protection provided by wilderness designation.

Three mines and associated access would disturb 20 to 40 acres in Cooper and Silver Creeks. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 2,000 acres.

Wilderness values would be lost on about 1000 acres along the northern edge of the WSA as a result of two small underground mines that would disturb 5 to 15 acres.

Alunite if developed, would disturb approximately 460 acres on Red Mountain and in Alpine Gulch. Wilderness values would be lost on about 8,000 acres as a result of the noise and visual effects of the mining operations for as long as the mine is operating.

Continued exploration and prospecting activity in the form of small excavations and minor road construction would disturb an additional 35 to 70 acres in high mineral potential acres throughout the WSA. Naturalness would be lost on these acres. Solitude and primitive and unconfined recreation would be lost on the lands in the vicinity of these operation while activity is ongoing.

No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the rest of the WSA will eventually be lost to human encroachment.

Conclusion: Approximately 520 to 585 acres would be disturbed from various mineral activities. Wilderness values would be directly lost on about 11,000 acres as a result of these activities. In the long term wilderness values would be lost on the entire 40,575 acres.

Impacts on Mineral Resource Development

The entire WSA would remain open to mineral entry. Alunite may be mined in the Red Mountain area producing 4 million tons of ore annually. Analysis of that project in a BLM draft EA indicated that the mine would generate 110 jobs and increase per capita income in Hinsdale County by nineteen percent by 2003. Base and precious metals are projected to be mined at three mines in the Cooper and Silver Creek drainages and at two mines along the northern edge of the WSA. Exploration and prospecting would continue throughout the WSA.

Conclusion: The entire 40,575 WSA would remain open to mineral entry with development of base and precious metals predicted to result from 5 small mines. If developed the alunite mine

on Red Mountain would produce 4 million tons of ore annually, generate 110 jobs and increase per capita income nineteen percent in Hinsdale County.

Impacts on Recreation Use

Overall the current use of 5000 RUDs is expected to increase by about 5 percent annually. The existing hiking, hunting, camping, photography and mountain climbing are expected to continue to occur. On those lands unaffected by mineral development (about 30,000 acres) these activities will occur in a primitive backcountry setting.

Those acres affected by mineral development (about 11,000 acres) primarily Alpine Gulch and Silver and Cooper Creeks, will continue to provide these same activities but in a setting dominated by roads and manmade intrusions. These acres are expected to also provide for 1250 RUDs of motorized recreation use as a result of additional roads being made available. Mineral development in Silver Creek would also result in the reopening of an access trail to Redcloud and Sunshine Peaks in Bent Creek. This would change the location but not the overall amount of use.

Conclusion: The existing 5000 RUDs would increase by about 5 percent annually. Existing activities would occur in a setting dominated by manmade intrusions. An additional 1250 RUDs of motorized recreation use would occur on new mining roads.

Impacts on Soils

Soil would be disturbed and productivity lost on 15 to 25 acres and along 3 to 9 miles of road (about 5 to 15 acres) associated with mineral development in Silver and Cooper Creeks. Development of the Red Mountain alunite deposit would disturb about 460 acres, including access. Another 5 to 15 acres would be disturbed and soil productivity would be lost along the northern boundary of the WSA from two small mining operations projected for that area. Throughout the WSA an additional 35 to 70 acres would be disturbed as a result of mineral exploration and prospecting.

Conclusion: Soil disturbance would occur and productivity would be lost on 520 to 585 acres as a result of predicted mineral activity.

Impacts on Water Quality

Development of alunite would have the potential to degrade water quality in up to 8 miles of stream in Alpine Gulch, East Alpine Gulch, Red Mountain Gulch and Wade Gulch. Contamination from sediment and heavy metals could extend beyond these drainages to Henson Creek, a source of domestic water for Lake City.

Mineral development involving three mines in the Cooper and Silver Creeks could result in some unquantified increase in sediment and heavy metal concentrations in up to 5 miles of stream in these drainages.

Contamination of less than 1 mile of Henson Creek from two small mines on the northern edge of the WSA would also occur, but is expected to be slight.

An unquantified amount of contamination of drainages throughout the WSA would result from continued exploration and prospecting. Overall this impact is expected to be minimal.

Conclusion: Mineral development in the Red Mountain area, Cooper and Silver Creeks and along the northern boundary as well as continued exploration would result in contamination of up to 14 miles of stream with sediment and heavy metals. This would be significant only in the case of Red Mountain development

activity.

Impacts on Wildlife

Impacts to wildlife, both terrestrial and aquatic, would result primarily from alunite development. Development of the mine and associated access would displace 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Since winter range is the controlling factor for population numbers in this area there would be no impact on the number of animals. Increased contamination of Alpine Gulch and East Alpine Gulch from sedimentation and heavy metal runoff would degrade the water quality and result in a loss of aquatic habitat on 4 to 5 miles of stream. Bighorn sheep habitat would not have any additional protection although no impacts are foreseen.

Conclusion: Development of alunite would result in displacing 50 to 80 deer and 100 to 130 elk to other portions of their summer range and degradation of water quality and loss of aquatic habitat in Alpine and East Alpine Gulch.

Wilderness Manageability Alternative

Impacts to Wilderness Values

Wilderness values within the 37,530 acres recommended as suitable would receive the protection provided by wilderness designation. The existing natural values in this portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Even with designation patented mining claims and other claims with valid existing rights are still expected to result in the development of three small underground mines in the Cooper and Silver Creek drainages. These would disturb approximately 15 to 25 acres and would require 3 to 9 miles (5 to 15 acres) of road construction within the WSA. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 2000 acres within these two drainages.

The Red Mountain alunite deposit would not be developed resulting in the continued protection of wilderness values on approximately 8000 acres that would have otherwise been lost. Designation would preclude surface disturbing exploration activity that would otherwise disturb about 30 to 60 acres within the WSA.

Within the 3,045 acres recommended nonsuitable two small underground mines are predicted. These would disturb 5 to 15 acres and impact wilderness values on approximately 1000 acres. An additional 5 to 15 acres would be disturbed as a result of mineral exploration in the nonsuitable portion of the WSA. Mineral exploration and mining activity would eventually eliminate wilderness values on the 3,045 recommended nonsuitable.

Conclusion: Although a total of 37,530 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could affect 2,000 acres and reduce the acreage on which wilderness values are actually preserved to 35,530. Wilderness values would also be lost on the 3,045 acres recommended nonsuitable.

Impacts on Mineral Resource Development

Subject to valid existing rights the 37,530

acres recommended as suitable for wilderness designation would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Of this approximately 21,000 acres have high potential, 11,000 acres have moderate potential and about 4500 acres have low potential. This would preclude any further surface disturbing exploration work not associated with valid existing rights. With the exception of the following projected mineral developments, the mineral potential in this area would be foregone and these minerals would be unavailable for future generations. The resultant economic losses are unquantifiable.

Valid rights are predicted to allow for the development of an unquantified amount of base and precious metals from three small underground mines in the Silver and Cooper Creek drainages. The alunite deposit in the Red Mountain area is not projected to be developed under this alternative. Therefore an estimated 4 million tons of ore (250,000 tons of aluminum) would not be produced annually and the projected resultant 110 jobs and nineteen percent increase in per capita income in Hinsdale County would not occur.

Development of two small mines for the production of base and precious metals on the northern edge of the WSA as well as exploration activity would be allowed to occur within the 3,045 acres recommended nonsuitable.

Conclusion: Subject to valid existing rights mineral development would be foregone on 37,530 acres recommended as suitable. Valid existing rights would allow development if three mines in Silver and Cooper Creeks. Two small mines and mineral exploration would be allowed on the 3,045 recommended nonsuitable. Development of 4 million tons of alunite ore annually would not occur nor would the projected resultant 110 jobs and nineteen percent increase in per capita income occur.

Impacts on Recreation Use

The 37,530 acres recommended suitable would provide for the continuation of the existing hiking, hunting, camping, photography and mountain climbing activities. The use within this portion of the WSA, estimated to be 4750 RUDs, is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles.

Access roads to projected mining operations in Cooper and Silver Creeks would not be open to motorized recreation use. Approximately 1000 RUDs of motorized recreation use that might otherwise occur would not be available. This development would also result in the reopening of an access trail to Redcloud and Sunshine Peaks in Bent Creek. This would not change the amount of use but would change the location.

Approximately 5 miles of trail would be developed in the Alpine Gulch vicinity. This is not expected to result in an increase in overall recreation use in the WSA, but would provide for better dispersion of use.

The 250 RUDs of recreation use that occurs in the nonsuitable portion is expected to continue with little impact.

Conclusion: The existing 4750 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur within the suitable area. This use would increase by about 9 percent annually. The 250 RUDs of use in the

nonsuitable portion would increase by about 5 percent annually with little change in the types of activities taking place.

Impacts to Soils

Within the area recommended as suitable soil would be disturbed and productivity would be lost on 15 to 25 acres and along 3 to 9 miles of road (about 5 to 15 acres) associated with mineral development in Silver and Cooper Creeks. Minor amounts of disturbance would result from trail construction in Bent Creek and Alpine Gulch. Disturbance of 30 to 60 acres from prospecting and exploration activity would be prevented. Without alunite development disturbance of 460 acres in Alpine Gulch and on Red Mountain would not occur.

Within the nonsuitable portion soil would be disturbed on 5 to 15 acres associated with two small mines along the northern would have a beneficial impact on water edge of the WSA and 5 to 15 acres as a result of mineral exploration activity.

Conclusion: Disturbance and loss of productivity would occur on 20 to 40 acres of soil from mineral development, access road construction and trail construction within the suitable area. Disturbance to 490 to 520 acres would be prevented. About 10 to 30 acres would be disturbed within the nonsuitable area. Overall 30 to 70 acres would be disturbed.

Impacts to Water Quality

In general designation of the 37,530 acres quality by preventing surface disturbing, mineral and mineral exploration activities. Most significantly this would include sedimentation and heavy metal contamination of Alpine Gulch, East Alpine Gulch, Red Mountain Gulch, and Wade Gulch that would otherwise result from alunite development.

Mining activity in Silver and Cooper Creek drainages would cause an unquantified increase in sedimentation and heavy metal concentrations in about 5 miles of those creeks.

A slight degradation of water quality in less than 1 mile of Henson Creek may occur from development of two mines within the nonsuitable portion of the WSA south of the creek.

Conclusion: Water quality in 5 miles of stream within the suitable area would be affected by mineral development in Silver and Cooper Creeks. Impacts to water quality associated with alunite development would not occur. Slight impacts to Henson Creek might result from two mines in the nonsuitable area.

Impacts on Wildlife

Without alunite development, the 50 to 80 deer and 100 to 130 elk that would otherwise have been displaced from their summer range and the degredation of aquatic habitat in Alpine Gulch would not be affected. Although there would be increases in recreation use and in some cases a relocation of that use due to trail development, levels are not expected to be large enough to have any significant effect on wildlife. In the long term wildlife would benefit through protection of terrestrial and aquatic habitat.

Conclusion: Impacts to terrestrial and aquatic habitat from alunite development would not occur. The overall impact would be the long term protection of 37,530 acres of habitat and about 200 elk, 120 deer and 20 bighorn sheep.

Conflict Resolution Alternative II

Impact on Wilderness Values

Wilderness values on the 11,140 acres recommended as suitable would receive the protection provided by wilderness designation. The existing natural values within this portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Even with designation the projected mineral development resulting from valid existing rights in Silver and Cooper Creeks would disturb 20 to 40 acres in these drainages. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 2000 acres within these two drainages. Designation would preclude impacts to wilderness values from further surface disturbing exploration activity on 10 to 20 acres that would otherwise occur.

Within the 29,435 acres nonsuitable portion of the WSA alunite development and mining activity along the northern boundary and exploration activity would result in a disturbance of 490 to 525 acres. In addition to the loss of wilderness values on these acres, the noise and visual impacts associated with a mine of this magnitude would result in a loss of wilderness values on about 9,000 acres for as long as these mining operations are active.

No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the entire nonsuitable portion of the WSA will eventually be lost to human encroachment.

> Conclusion: Although 11,140 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 9,140. In addition wilderness values would be lost on about 9,000 acres in the nonsuitable portion of the WSA as a result of alunite mining and other small mineral operations. In the long term wilderness values would be lost on the 29,435 acres recommended nonsuitable.

Impacts on Mineral Resource Development

Subject to valid existing rights the 11,140 recommended as suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Of this about 7500 acres have high potential, 2000 acres have moderate potential with the remaining acreage having low potential. This would preclude any continued surface disturbing exploration work not associated with valid existing rights. With the exception of the following projected mineral development, the high potential of this portion of the WSA would be foregone and these minerals primarily base and precious metals, would be unavailable for future generations. The resultant economic losses are unquantifiable.

Due to the large number of mining claims, existence of patented mining claims and the high potential for discovery of base and precious metals in the Silver and Cooper Creek drainages, valid existing rights are projected to exist in this area after designation. As a result of these rights

an unquantified amount of base and precious metals are expected to be produced from three mines within the area recommended as suitable.

The 29,435 acres recommended as nonsuitable would remain open to mineral entry. Expected development would include a large scale alunite mine on Red Mountain projected to produce 4 million tons of ore (250,000 tons of aluminum) annually. Analysis of that project in a BLM draft EA indicated that the mine would generate 110 jobs and increase per capita income in Hinsdale County by nineteen percent by 2003. Two small underground mines south of Henson Creek are projected to produce an unquantified amount of base and precious metals.

Conclusion: The proposed action would withdraw 11,140 acres from mineral entry, subject to valid existing rights. Due to predicted valid existing rights development of three mines for the production of base and precious metals in the Silver and Cooper Creek drainages would still occur. The 29,435 acres recommended as nonsuitable would remain open to mineral entry. Production of 4 million tons of alunite as well as an unquantified amount of base and precious metals from two mines would occur. Alunite development would create 110 jobs and increase per capita income by nineteen percent by 2003 in Hinsdale County.

Impacts on Recreation Use

The 11,140 acres recommended as suitable would provide for the continuation of the existing hiking, hunting, camping, photography and mountain climbing activities. The use within this portion of the WSA, estimated to be 2500 RUDs, is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles.

Access roads to projected mining operations in Cooper and Silver Creeks would not be open to motorized recreation use. Approximately 1000 RUDs of motorized recreation use that might otherwise occur would not be available. This development would also result in the reopening of an access trail to Redcloud and Sunshine Peaks in Bent Creek. This would not change the amount of use but would change the location.

Within the nonsuitable portion of the WSA development of the Red Mountain alunite deposit would change the existing primitive backcountry recreation setting to one dominated by roads and manmade intrusions. Overall use of 2500 RUDs is expected to increase by about 5 percent annually. With development of the mine there would be shift from the existing hiking, hunting and camping activities to motorized use in the Alpine Gulch vicinity.

Conclusion: The existing 2500 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur within the suitable area. This use is expected to increase by about 9 percent annually. The current 2500 RUDs of use in the nonsuitable portion would increase by about 5 percent annually and shift toward motorized recreation in the Alpine Gulch area.

Impacts on Soils

Soil would be disturbed and productivity lost on 15 to 25 acres and along 3 to 9 miles of road (about 5 to 15 acres) associated with potential mineral development in Silver and Cooper Creeks within the suitable portion of the WSA. In addition, soil would be disturbed on 2-3 acres as a result of 3 to 5 miles of trail construction in Bent Creek.

Preclusion of mineral exploration in the portion of the WSA recommended suitable would prevent soil disturbance on 10 to 20 acres that would otherwise result from prospecting activities.

Within the nonsuitable area alunite development would disturb 425 acres of soil as part of the mine, and 35 acres from construction of access roads. Another 5 to 15 acres would be disturbed from mine development in the nonsuitable area along the northern edge of the WSA. Prospecting would disturb soil on an additional 25 to 50 acres. Productivity of this soils would be lost on all of these acres.

Conclusion: Within the suitable area soil would be disturbed and productivity would be lost on approximately 20 to 40 acres as a result of mineral development and trail construction. Disturbance of 10 to 20 acres from prospecting activity would be prevented. Soil would be disturbed and productivity lost on up to 460 acres from alunite and other mineral development in the area recommended nonsuitable. An additional 30 to 60 acres would be disturbed as a result of other mineral development and prospecting. Overall 500 to 560 acres would be disturbed.

Impacts on Water Quality

Designation of the 11,140 acres recommended as suitable would generally have a beneficial impact by preventing surface disturbing activities that would otherwise degrade water quality. Development of three mines and associated access roads would result in some unquantified increase in sediment and heavy metal concentrations in 5 miles of stream in these two drainages. By precluding mineral exploration that would otherwise disturb 10 to 20 acres additional contamination of drainages throughout the suitable area would be prevented.

Development of alunite within the portion of the WSA recommended as nonsuitable would have the potential to degrade water quality in up to 8 miles of Alpine Gulch, East Alpine Gulch, Red Mountain Gulch and Wade Gulch. Contamination of these drainages from sediment and heavy metals could not only affect water quality in those drainages but also in Henson Creek, a source of domestic water for Lake City.

Contamination of less than 1 mile of Henson Creek from two small mines on the northern edge of the WSA would also occur, although this impact is expected to be slight.

Conclusion: Degradation of water quality would occur in both the suitable and nonsuitable portions of the WSA. These would be concentrated in the Cooper and Silver Creek areas within the suitable portion. Alpine Gulch, East Alpine Gulch, Red Mountain Gulch, Wade Gulch and Henson Creek would be affected as a result of alunite development in the nonsuitable portion of the WSA. Overall, about 14 miles of stream could be affected.

Impacts on Wildlife

The primary impacts to wildlife, both terrestrial and aquatic, would occur in the nonsuitable portion as a result of alunite development. Development of the mine and access road would displace approximately 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Since winter range is the controlling factor for population numbers in the area there would be no impact on the number of animals. In addition, mining activity and development of the access road would result in increased sedimentation and heavy metal concentration in Alpine Gulch and East Alpine Gulch. This would result in an unquantified degredation of water quality and loss of aquatic habitat. Within that portion of the WSA recommended suitable

development in Silver and Cooper Creeks drainages is not expected to affect terrestrial or aquatic wildlife in those drainages. This is primarily due to the fact that the mining operation would be small, no public access would be provided, the deer and elk populations in these areas are small, and productive fish habitat is limited to the upper reaches of Cooper Creek. Habitat for about 20 bighorn sheep would be protected in the southern portion of the WSA. In addition, deer and elk habitat would be protected on the 11,140 acres recommended suitable.

Conclusion: Development of the alunite deposit would displace 50 to 80 deer and 100 to 130 elk to other portions of their summer range. Aquatic habitat in Alpine and East Alpine Gulch would be degraded. Bighorn sheep, elk and deer habitat would be protected on 11,140 acres.

Handies Peak (CO-030-241)

Proposed Action (Conflict Resolution Alternative)

Impacts on Wilderness Values

Wilderness values on the 7,885 acres recommended as suitable would receive the protection provided by wilderness designation subject to valid existing mineral rights. The existing natural values within this portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Within the portion of the WSA recommended as suitable, mineral developments are projected to occur in the American Basin area as a result of valid existing rights. Three mines could potentially be developed in this area occupying a total of 100 acres. Access would involve up to 9 miles of road construction (15 acres). The mining activity might be located either within the area recommended as suitable on valid existing rights or outside the designated wilderness boundary but within the cherry stem. In either case naturalness would be lost on these acres and for as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 1000 acres within this drainage. Designation would preclude any further surface disturbing exploration activities. This would prevent disturbance of 10 to 20 acres that might otherwise result from prospecting in the area.

Wilderness values within the nonsuitable area would be directly lost on approximately 400 acres as a result of the sound and visual affects of mineral development on private property near Campbell Creek. Approximately 10 to 20 acres would be disturbed by mineral exploration. No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the 10,975 acres recommended nonsuitable will eventually be lost to human encroachment.

Conclusion: Although 7,885 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights in American Basin could reduce the acreage on which wilderness values would actually be preserved to 6,885. Wilderness values could be lost on 400 of the 10,975 acres recommended

nonsuitable as a result of mineral development on private property near Campbell Creek. An additional 10 to 20 acres would be lost to mineral exploration. In the long term wilderness values would be lost on the entire 10,975 acres recommended nonsuitable.

Impacts on Mineral Resource Development

Subject to valid existing rights the 7,885 acres recommended as suitable would be withdrawn from all forms of mineral entry. About 60 percent of these acres have high mineral potential and 40 percent have moderate potential. This would preclude any continued surface disturbing exploration work. With the exception of the following projected mineral development, the potential in this portion of the WSA would be foregone and these minerals would be unavailable for future generations. The resultant economic losses are unquantifiable.

Due to the large number of mining claims, existence of patented property and the high potential for discovery of base and precious metals, uranium and strategic minerals valid existing rights are projected to exist within the suitable area after designation. These rights are predicted to lead to development of three moderate sized mining operation in the American Basin Area.

Within the 10,975 area recommended as nonsuitable one small scale mine is projected on private property near Campbell Creek for the production of base and precious metals. Although the remaining nonsuitable area would be open to mineral entry, no activity other than exploration work is expected.

Conclusion: The 7,885 acres recommended suitable would be withdrawn from entry, although three mines are projected based on valid existing rights. One small scale mine would be developed within the nonsuitable area.

Impacts on Recreation Use

The 7,885 acres recommended as suitable would provide for the continuation of the existing hiking, hunting, camping, photography, and mountain climbing activities. The use within this portion of the WSA, estimated to be 3000 RUDs is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles except in American Basin, where the sights and sounds associated with mineral development could detract from that backcountry experience on about 1000 acres.

The existing use within the nonsuitable portion of the WSA for hunting access to the National Forest is expected to continue in the current primitive backcountry setting.

This setting would be altered to one influenced by the sounds and activities associated with mineral development in the vicinity of Campbell Creek. The current 1000 RUDs in the nonsuitable portion of the WSA are expected to increase by about 5 percent annually.

Conclusion: The existing 3000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur in the suitable area except where affected by mineral development in American Basin. This use will increase by about 9 percent annually. Use of the nonsuitable area for hunting access would continue and increase by about 5 percent annually. Mineral development near Campbell Creek would detract from the backcountry experience in that area.

Impact on Soils

Soil would be disturbed and productivity lost on 100 acres and along 9 miles of road (15 acres) associated with potential mineral development resulting from valid existing rights in American Basin within the suitable portion of the WSA.

Preclusion of mineral exploration in the portion of the WSA recommended suitable would prevent soil disturbance on 10 to 20 acres that would otherwise result from prospecting activities.

Approximately 10 to 20 acres would be disturbed by mineral exploration activity within the nonsuitable areas. Productivity of these soils would be lost on all of these acres.

> Conclusion: Within the suitable area productivity would be lost on 115 acres as a result of mineral development. Disturbance of 10 to 20 acres from exploration activities would be prevented. Soil would be disturbed and productivity lost on 10 to 20 acres as a result of mineral exploration in the nonsuitable area. Overall 125 to 145 acres would be disturbed.

Impact on Water Quality

Designation of the 7,885 acres recommended as suitable would generally have a beneficial impact by preventing surface disturbing activities that could otherwise degrade water quality. Development of three mines and associated access roads could result in some unquantified increase in sediment and heavy metal concentrations in two miles of the Lake Fork of the Gunnison River. By precluding mineral exploration that would otherwise disturb 10 to 20 acres, additional contamination of this drainage would be prevented.

Development in the nonsuitable area near Campbell Creek would have the potential to degrade water quality in two miles of Campbell Creek and also downstream for about 1 mile in the Lake Fork. Disturbance of 10 to 20 acres throughout the nonsuitable area could also result in an unquantified increase in sediment and heavy metal concentration in the various drainages throughout the WSA.

> Conclusion: Mineral exploration and development resulting from valid existing rights within the suitable area would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork. Preclusion of exploration activity would prevent any additional contamination of this drainage. Mineral exploration and development in the nonsuitable area would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, water quality could be degraded in up to 5 miles of stream.

Impact on Wildlife

Designation of 7,885 acres as wilderness would protect the summer and winter range for bighorn sheep and elk populations in the area. Even though designated, valid existing rights would allow for mineral development in the American Basin area. This would result in the displacement of about 10 of the 89 elk estimated to summer in the WSA. Since winter range is the constraining factor for the elk population no animals are expected to be lost but merely displaced to other portions of the WSA. Exploration activity that would further disturb bighorn sheep and elk would be precluded within the suitable area.

Projected mineral development in the nonsuitable area near Campbell Creek could result in a loss of about 5 of the 36 bighorn sheep reported to winter in the Lake Fork, Boulder Gulch and Cataract Gulch

area. Exploration activities throughout the remainder of the nonsuitable area would have only minimal effects on the elk and bighorn populations. The primary impact would be to displace these animals during the time that exploration activity is actually taking place.

Conclusion: Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Exploration activity would be precluded within the suitable area thereby protecting bighorn sheep and elk habitat. Mineral development and exploration in the nonsuitable area would result in a loss of about 5 bighorn sheep., Habitat would be protected on 7,885 acres.

All Wilderness Alternative

Impacts on Wilderness Values

Wilderness values on the entire 18,860 acres would receive the protection provided by wilderness designation. The existing natural values of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing. The exceptions would be in the American Basin area and near Campbell Creek where projected mineral development resulting from valid existing rights would cause a loss of wilderness values even though designated as wilderness. Surface disturbance would occupy an estimated 115 acres. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 1400 acres within these areas.

Conclusion: Although the entire 18,860 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values would actually be preserved to 17,460.

Impacts on Mineral Resource Development

Subject to valid existing rights 18,860 acres would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. This would include 7500 acres with high potential, 5000 acres with moderate potential and 6500 acres with low potential. This would preclude any further surface disturbing exploration work. With the exception of the following projected mineral development, the high potential found in this WSA would be foregone and these minerals would be unavailable for future generations. The resultant economic losses are unquantifiable.

Valid existing rights are projected to allow for the development of three moderate sized mining operations for the recovery of base and precious metals, uranium and strategic minerals in the American Basin area. A small scale mine is projected on private property near Campbell Creek for the production of base and precious metals.

Conclusion: Subject to valid existing rights the entire 18,860 acres would be withdrawn from mineral entry. Valid rights are expected to allow for development of base and precious metals from four mines in the American Basin and Campbell Creek areas.

Impacts on Recreation Use

The 18,860 acres recommended as suitable would continue to provide for the existing hiking, hunting, camping, photography, and mountain climbing activities. The use in the WSA, estimated to be 4000 RUDs, is expected to increase by about 9 percent

annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles except in American Basin and near Campbell Creek where sights and activities associated with potential mineral activities could detract from the backcountry experience on about 1400 acres.

Conclusion: The current 4000 RUDs would increase by about 9 percent annually with designation. Hiking, hunting, camping, photography, and mountain climbing would continue to occur in a primitive backcountry setting except on about 1400 acres affected by mineral development.

Impact on Soils

Soil would be disturbed and productivity lost on 100 acres and along 9 miles of road (15 acres) associated with potential mineral development resulting from valid existing rights in American Basin.

Preclusion of mineral exploration throughout the WSA would prevent soil disturbance on 20 to 40 acres that would otherwise result from prospecting activities.

Conclusion: Soil productivity would be lost on up to 115 acres as a result of mineral development. Disturbance of 20 to 40 acres from exploration activities would be prevented.

Impact on Water Quality

Designation of the entire 18,860 acres recommended as suitable would generally have a beneficial impact by preventing surface disturbing activities that could otherwise degrade water quality. Development of three mines and associated access roads resulting from valid existing rights could result in some unquantified increase in sediment and heavy metal concentrations in two miles of the Lake Fork of the Gunnison River and two miles in Campbell Creek. By precluding mineral exploration that would otherwise disturb 20 to 40 acres, additional contamination of this and other drainages would be prevented.

Conclusion: Mineral exploration and development resulting from valid existing rights within the WSA would cause some unquantified increase in sediment and heavy metal concentrations in four miles of the Lake Fork and Campbell Creek. Preclusion of exploration activity as a result of designation would prevent any additional contamination of these drainages.

Impact on Wildlife

Designation of the entire 18,860 acres as wilderness would protect the summer and winter range for bighorn sheep and elk populations in the area. Even though designated, valid existing rights would allow for mineral development in the American Basin area. This would result in the displacement of about 10 of the 89 elk estimated to summer in the WSA. Since winter range is the constraining factor for the elk population no animals are expected to be lost but merely displaced to other portions of the WSA. Projected mineral development in the Campbell Creek area could result in a loss of about 5 of the 36 bighorn sheep reported to winter in the Lake Fork, Boulder Gulch and Cataract Gulch area. Exploration activity that would further disturb bighorn sheep and elk would be precluded.

Conclusion: Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Exploration activity would be precluded thereby protecting bighorn sheep and elk habitat. Mineral

development and exploration in the Campbell Creek area would result in a loss of about 5 bighorn sheep. Habitat would be protected on 18,860 acres.

No Wilderness Alternative

Impacts on Wilderness Values

None of the wilderness values in the WSA would receive the legislative protection provided by wilderness designation.

Projected mineral activity in the American Basin and Campbell Creek areas would result in disturbance of about 115 acres. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 1400 acres within these areas. Mineral prospecting and exploration could disturb an additional 20 to 40 acres within the WSA. This would involve small excavations and road construction and would be located primarily in the high mineral potential area in the western half of the WSA. Naturalness would be lost on these acres. Solitude and primitive recreation would be lost on the lands in the vicinity of these operation while activity is ongoing.

No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the rest of the WSA will eventually be lost to human encroachment.

Conclusion: Wilderness values would be lost on about 1,400 acres as a result of mineral activity. Wilderness values would be unprotected on the remaining acreage and in the long term would be lost.

Impacts on Mineral Resource Development

The entire WSA would remain open to mineral entry. Base and precious metals, uranium, and strategic minerals are projected to be mined in the American Basin area. Base and precious metals might also be produced on private property near Campbell Creek.

Mineral exploration would be allowed to continue throughout the WSA. The resultant economic benefits are unquantifiable.

Conclusion: The entire WSA would remain open to entry with production of base and precious metals, uranium, and strategic minerals projected to result from four mines.

Impacts on Recreation Use

Overall the current 4000 RUDs are expected to increase by about 5 percent annually. The existing hiking, hunting, camping, photography, and mountain climbing are expected to continue to occur. On those lands unaffected by mineral development (about 17,460 acres) these activities will continue to occur in a primitive backcountry setting.

Those areas affected by mineral development (about 1400 acres) in American Basin and near Campbell Creek will continue to provide these same activities but in a setting affected by the sights and sounds of mineral development.

Conclusion: The existing 4000 RUDs would increase by about 5 percent annually. Existing activities would continue to occur in a primitive backcountry setting except in American Basin and near Campbell Creek where the

setting would be influenced by the sights and sounds of mineral activity.

Impact on Soils

Soil would be disturbed and productivity lost on 100 acres and along 9 miles of road (15 acres) associated with potential mineral development resulting from valid existing rights in American Basin. Approximately 20 to 40 acres would be disturbed by mineral exploration activity. Productivity of these soils would be lost.

Conclusion: Soil productivity would be lost on 115 acres as a result of mineral development. Soil would be disturbed and productivity lost on 20 to 40 acres as a result of mineral exploration. Overall 135 to 155 acres would be disturbed.

Impact on Water Quality

Development of three mines and associated access roads could result in some unquantified increase in sediment and heavy metal concentrations in two miles of the Lake Fork of the Gunnison River. Development near Campbell Creek would have the potential to degrade water quality in two miles of Campbell Creek and also downstream for about 1 mile in the Lake Fork. Disturbance of 20 to 40 acres throughout the WSA could also result in an unquantified increase in sediment and heavy metal concentration in the various drainages throughout the WSA.

Conclusion: Mineral exploration and development within the WSA would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork and Campbell Creek. Mineral exploration would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, up to 5 miles of stream could be affected.

Impact on Wildlife

Development in the American Basin area would result in the displacement of about 10 of the 89 elk estimated to summer in the WSA. Since winter range is the constraining factor for the elk population no animals are expected to be lost but merely displaced to other portions of the WSA. Projected mineral development in the Campbell Creek area could result in a loss of about 5 of the 36 bighorn sheep reported to winter in the Lake Fork, Boulder Gulch and Cataract Gulch area. Exploration activities throughout the WSA would have only minimal effects on the elk and bighorn populations. The primary impact would be to displace these animals during the time that exploration activity is actually taking place.

Conclusion: Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Mineral development and exploration would result in a loss of about 5 bighorn sheep. Habitat would not be protected by designation.

Wilderness Manageability Alternative

Impacts on Wilderness Values

Wilderness values on the 8,220 acres recommended as suitable would receive the protection provided by wilderness designation subject to valid existing mineral rights. The existing natural values within the suitable portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks, deep canyons and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing in this highly scenic subalpine and alpine environment would continue to be available.

Within the portion of the WSA recommended

as suitable, mineral developments are projected to occur in the American Basin area as a result of valid existing rights. Three mines could potentially be developed in this area occupying a total of 100 acres. Access would involve up to 9 miles of road construction (15 acres). The mining activity might be located either within the area recommended as suitable on valid existing rights or outside the designated wilderness boundary but within the cherry stem. In addition, mineral development on private property near Campbell Creek would similarily impact wilderness values on about 400 acres. Naturalness would be lost on these acres. For as long as these mines are in production, the visual and noise impacts would result in loss of opportunities for solitude and primitive and unconfined recreation about 1400 acres within these areas.

Designation would preclude any further surface disturbing exploration activities. This would prevent disturbance of 10 to 20 acres that might otherwise result from prospecting in the area.

Exploration activity is expected to disturb 10 to 20 acres, primarily in the west and southwest portion of the WSA. No mineral or other development, other than that described above, is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the 10,640 acres recommended nonsuitable will eventually be lost to human encroachment.

Conclusion: Although 8,220 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights in American Basin could reduce the acreage on which wilderness values would actually be preserved to 6,820. About 10 to 20 acres would be lost within the nonsuitable area as a result of mineral exploration. In the long term wilderness values will be lost on the 10,640 acres recommended nonsuitable.

Impacts on Mineral Resource Development

Subject to valid existing rights the 8,220 acres recommended as suitable would be withdrawn from all forms of mineral entry. About 60 percent of these acres have high potential and 40 percent have moderate potential. This would preclude any continued surface disturbing exploration work. With the exception of the following projected mineral development, the potential found within this portion of the WSA would be foregone and these minerals would be unavailable for future generations. The resultant economic losses are not quantifiable.

Due to the large number of mining claims, existence of patented property and the high potential for discovery of base and precious metals, uranium and strategic minerals valid existing rights are projected to exist with the suitable area after designation. These rights are predicted to lead to development of three moderate sized mining operations in the American Basin area. In addition, a mine is projected to be developed on private land near Campbell Creek for the production of base and precious metals.

No mineral development is projected on the 10,640 acres recommended nonsuitable although exploration, especially in the western and southwestern area is expected to continue.

Conclusion: The 8,220 acres recommended as suitable would be withdrawn from entry. Valid existing rights would allow for development of three mines in American Basin and one near Campbell Creek. No development is

projected in the nonsuitable portion of the WSA although exploration would continue.

Impacts on Recreation Use

The 8,220 acres recommended as suitable would provide for the continuation of the existing hiking, hunting, camping, photography, and mountain climbing activities. The use within this portion of the WSA, estimated to be 3000 RUDs is expected to increase by about 9 percent annually as a result of designation. These activities would continue to occur in a primitive backcountry setting devoid of motorized vehicles except in American Basin and near Campbell Creek, where the sights and sounds associated with mineral development could detract from that backcountry experience on about 1400 acres.

The existing use within the nonsuitable portion of the WSA for hunting access to the National Forest is expected to continue in the current primitive backcountry setting.

The current 1000 RUDs in the nonsuitable portion of the WSA are expected to increase by about 5 percent annually.

Conclusion: The existing 3000 RUDs of hiking, hunting, camping, photography and mountain climbing in a primitive backcountry setting would continue to occur in the suitable area except where affected by mineral development in American Basin and Campbell Creek. This use will increase by about 9 percent annually. Use of the nonsuitable area for hunting access would continue and increase by about 5 percent annually.

Impact on Soils

Soil would be disturbed and productivity lost on 100 acres and along 9 miles of road (15 acres) associated with potential mineral development resulting from valid existing rights in American Basin within the suitable portion of the WSA.

Preclusion of mineral exploration in the portion of the WSA recommended suitable would prevent soil disturbance on 10 to 20 acres that would otherwise result from prospecting activities.

Approximately 10 to 20 acres would be disturbed by mineral exploration activity within the nonsuitable areas. Productivity of these soils would be lost on all of these acres.

Conclusion: Within the suitable area productivity would be lost on 115 acres as a result of mineral development. Disturbance of 10 to 20 acres from exploration activities would be prevented. Soil would be disturbed and productivity lost on 10 to 20 acres as a result of mineral exploration in the nonsuitable area. Overall 125 to 145 acres would be disturbed.

Impact on Water Quality

Designation of the 8,220 acres recommended as suitable would generally have a beneficial impact by preventing surface disturbing activities that could otherwise degrade water quality. Development of three mines and associated access roads could result in some unquantified increase in sediment and heavy metal concentrations in two miles of the Lake Fork of the Gunnison River. Development near Campbell Creek would have the potential to degrade water quality in two miles of Campbell Creek and also downstream for about 1 mile in the Lake Fork. By precluding mineral exploration that would otherwise disturb 10 to 20 acres, additional contamination of this drainage would be prevented.

Disturbance of 10 to 20 acres from exploration activity throughout the

nonsuitable area could result in an unquantified increase in sediment and heavy metal concentration in the various drainages throughout the WSA.

Conclusion: Mineral exploration and development resulting from valid existing rights within the suitable area would cause some unquantified increase in sediment and heavy metal concentrations in the Lake Fork. Preclusion of exploration activity would prevent any additional contamination of this drainage. Mineral exploration and development in the nonsuitable area would result in an unquantified increase in sediment and heavy metal concentrations in various drainages throughout the WSA. Overall, about 5 miles could be affected.

Impact on Wildlife

Designation of 8,220 acres as wilderness would protect the summer and winter range for bighorn sheep and elk populations in the area. Even though designated, valid existing rights would allow for mineral development in the American Basin area. This would result in the displacement of about 10 of the 89 elk estimated to summer in the WSA. Since winter range is the constraining factor for the elk population no animals are expected to be lost but merely displaced to other portions of the WSA. Projected mineral development in the Campbell Creek area could result in a loss of about 5 of the 36 bighorn sheep reported to winter in the Lake Fork, Boulder Gulch and Cataract Gulch area. Exploration activity that would further disturb bighorn sheep and elk would be precluded within the suitable area.

Exploration activities throughout the remainder of the nonsuitable area would have only minimal effects on the elk and bighorn populations. The primary impact would be to displace these animals during the time that exploration activity is actually taking place.

Conclusion: Mineral development in American Basin would displace about 10 elk to other portions of their summer range. Mineral development in the Campbell Creek area would result in a loss of about 5 bighorn sheep. Exploration activity would be precluded within the suitable area thereby protecting bighorn sheep and elk habitat on 8,220 acres.

American Flats (CO-030-217)

Proposed Action (Conflict Resolution Alternative)

Impacts on Wilderness Values

Wilderness values on the 1,505 acres recommended as suitable would receive the protection provided by wilderness designation. The existing natural values in this portion of the WSA would remain undisturbed. Outstanding opportunities for solitude inherent in the high peaks and open expanses of alpine tundra would be protected. The outstanding opportunities for climbing, hiking, camping and fishing in this highly scenic alpine environment would continue to be available.

Within the 3,205 acre portion of the WSA recommended as nonsuitable mineral development is projected to occur. One medium underground mine is predicted to be developed in the southeastern portion of the WSA. If developed this mine would occupy about 15 acres and require up to 5 miles (10 acres) of road construction. Naturalness would be lost on these acres. For as long as this mine is in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on

about 300 acres. Exploration work would likely disturb an additional 10-15 acres within the nonsuitable area along the eastern portion of the WSA. This disturbance would result from minor excavations and road construction.

No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the 3,205 acres recommended will eventually be lost to human encroachment.

Conclusion: The 1,505 acres recommended suitable would receive the protection provided by wilderness designation. Wilderness values would be lost on about 315 acres within the nonsuitable area as a result of mineral exploration and development and eventually lost on the entire 3,205 acres not recommended.

Impacts on Mineral Resource Development

The 1,505 acres recommended as suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Since this area has low mineral potential this is not anticipated to have any affect on mineral development although any undiscovered minerals would be foregone.

Exploration would be allowed to continue within the nonsuitable portion of the WSA. One medium underground mine is projected to be developed in the southeastern portion of the WSA for the production of base minerals and precious metals.

Conclusion: Although the 1,505 acres recommended suitable would be withdrawn there should be no impact as the area has low potential for development. The remaining area would remain open to entry with one mine projected in the southeast portion of the WSA.

Impacts on Recreation Use

The 1505 acres recommended as suitable would provide for the continuation of hiking and hunting activities in a backcountry setting. The current 1200 RUDs are expected to increase by about 9 percent annually.

The existing use within the nonsuitable portion of the WSA for hiking and hunting is expected to continue in the current backcountry setting except in the vicinity of the projected mineral development. In this area the setting would become one affected by the sights and sounds of mining activity. The 300 RUD is expected to increase by about 5 percent annually.

Conclusion: The 1200 RUDs in the suitable area are expected to increase by about 9 percent annually. The hiking and hunting activities in this area will continue to occur in a backcountry setting. This backcountry setting would continue in the nonsuitable portion as well except near the potential mineral development. The 300 RUDs in the nonsuitable portion would increase by about 5 percent annually.

Impact on Soils

Within the suitable area surface disturbance activity would be precluded and continued soil productivity would be assured.

Within the nonsuitable area projected mineral development would disturb up to 25 acres of soil. In addition, exploration activity is expected to cause disturbance to about 10 to 15 acres. Soil productivity would be lost on all these acres.

Conclusion: Soil productivity would be protected within the suitable area and lost on up to 40 acres within the nonsuitable portion.

Impact on Water Quality

Designation of the 1,505 acres recommended as suitable would have a beneficial impact by preventing future surface disturbing activities that could otherwise degrade water quality.

Mineral development in the nonsuitable area would disturb up to 25 acres. This could result in some increase in sediment and heavy metal concentrations in less than 1 mile of Henson Creek. Mineral exploration throughout the nonsuitable area would also disturb 10 to 15 acres and result in some minor unquantified degradation of water quality in small drainages in this area.

Conclusion: Water quality would be protected within the 1,505 acres recommended as suitable. Disturbance of up to 40 acres in the nonsuitable area due to mineral exploration and development could result in some unquantified degradation of water quality in small drainages in the WSA and in less than 1 mile of Henson Creek.

Impact on Wildlife

Designation of 1,505 acres as wilderness would protect a portion of the summer range for 11 bighorn sheep.

Projected mineral exploration and development in the nonsuitable area would cause some disturbance of wildlife habitat. No identified populations of big game use this area and therefore these impacts would be minimal.

Conclusion: Designation would protect habitat for 11 bighorn sheep. Mineral exploration and development in the nonsuitable portion of the WSA would have minimal impact on wildlife habitat.

All Wilderness Alternative

Impacts on Wilderness Values

The entire 4,710 acres in the WSA would be provided the protection afforded by wilderness designation. The existing wilderness values would be protected in the long term with the exception of those in the vicinity of one projected mine that would disturb about 22 acres. Naturalness would be lost on these acres. For as long as the mine is in operation, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 300 acres on the southeast edge of the WSA.

Conclusion: Although 4,710 acres would be designated and protected as wilderness, potential mineral development resulting from valid existing rights could reduce the acreage on which wilderness values are actually preserved to 4,410.

Impacts on Mineral Resource Development

The entire 4,710 acres in the WSA would be withdrawn from mineral entry. This includes 1000 acres of high potential, 2000 acres of moderate potential and 1500 acres of low potential. The primary impact would be to eliminate all surface disturbing exploration activity within the WSA. The only projected development, involving one medium underground operation for the production of base and precious metals would still occur under valid existing rights. Since mineral potential is low in the remainder of the WSA the lack of exploration opportunities is not expected to be significant although any undiscovered minerals would be foregone.

Conclusion: Subject to valid existing

rights exploration would be precluded within the entire 4,710 acres. Development of one mine in the southeastern portion of the WSA is projected to occur.

Impacts on Recreation Use

The existing backcountry setting would continue to be for use by hikers and hunters. Development projected in the southeastern portion of the unit would alter the backcountry setting in the vicinity of that operation to one influenced by the sights and sounds of mining activity. The impact would be slight since recreation use in this portion of the WSA is low. Overall recreation use of about 1,500 recreation user days would be expected to increase by about 9 percent annually.

Conclusion: The existing backcountry setting and existing uses would be maintained except in the vicinity of projected mineral development where it would be altered to one influenced by the sights and sounds of mining activity. Recreation use of about 1500 RUDs would increase by about 9 percent annually.

Impact on Soil

Designation of the entire 4,710 acres would prevent disturbance of 10 to 15 acres of soils that would otherwise occur as a result of mineral exploration. Productivity of these soils would be preserved.

Mineral development resulting from valid existing rights would disturb an estimated 25 acres. Productivity of these soils would be lost.

Conclusion: Soil productivity would be preserved on 10 to 15 acres that would otherwise be lost due to exploration work. Productivity would be lost on up to 15 acres as a result of mineral development.

Impact on Water Quality

Designation of the entire 4,710 acres would have the general effect of protecting water quality. Disturbance of approximately 10 to 15 acres by mineral exploration activity would not occur. Some unquantified increases in sediment and heavy metal concentrations in less than 1 mile of Henson Creek due to mineral development on 25 acres could occur.

Conclusion: Disturbance would be precluded and water quality protected with the exception of one mineral development resulting from valid existing rights. Some unquantified contamination of Henson Creek could occur.

Impact on Wildlife

Designation of the entire 4,710 acres would protect a portion of the summer range for 11 bighorn sheep. Projected mineral development resulting from valid existing rights would cause some disturbance of wildlife habitat. No identified big game populations use this area and therefore these imapcts would be minimal.

Conclusion: Designation would protect habitat for 11 bighorn sheep. Mineral development would have a minimal effect on wildlife habitat.

No Wilderness Alternative

Impacts on Wilderness Values

None of the wilderness values in the WSA would receive the legislative protection provided by wilderness designation. Projected mineral development in the

southeast portion of the WSA would result in about 25 acres of surface disturbance. Naturalness would be lost on these acres. For as long as this mine is in production, the visual and noise impacts would result in a loss of opportunities for solitude and primitive and unconfined recreation on about 300 acres. An additional 10 to 20 acres would be disturbed, primarily in the eastern end of the WSA as a result of mineral exploration.

No mineral or other development other than that described above is projected to occur on the remaining portion of the WSA. However, it is anticipated that without benefit of wilderness designation the wilderness values associated with the entire WSA will eventually be lost to human encroachment.

Conclusion: Wilderness values would be lost on up to 320 acres primarily in the southeast portion of the WSA as a result of mineral exploration and development activity. Wilderness values on the remaining acreage would eventually be lost to human encroachment.

Impacts on Mineral Resource Development

The entire WSA would remain open to mineral entry. Base and precious metals are projected to be mined at one medium underground operation in the southeast portion of the WSA.

Mineral exploration would be allowed to continue throughout the WSA.

Conclusion: The entire WSA would remain open to entry with production of base and precious metals projected to result from one mine. .

Impacts on Recreation Use

A backcountry recreation setting would remain in most of the WSA except where altered by the projected mineral activity in the southeast. Use would continue to be primarily for hiking, hunting, nature study and photography. Existing use of 1500 RUDs would increase by about 5 percent annually.

Conclusion: The existing backcountry recreation setting would remain except where altered by mineral development. The existing 1500 RUDs would increase by about 5 percent annually.

Impact on Soils

Within the WSA projected mineral development would disturb up to 25 acres of soil. In addition, exploration activity is expected to cause disturbance to about 10 to 15 acres. Soil productivity would be lost on all these acres.

Conclusion: Soil productivity would be lost on up to 40 acres as a result of mineral exploration and development.

Impact on Water Quality

Mineral development would disturb up to 25 acres. This could result in some increase in sediment and heavy metal concentrations in less than 1 mile of Henson Creek. Mineral exploration throughout the WSA would also disturb 10 to 15 acres and result in some minor unquantified degradation of water quality in small drainages in this area.

Conclusion: Disturbance of up to 40

acres due to mineral exploration and development could result in some unquantified degradation of water quality in small drainages in the WSA and less than 1 mile of Henson Creek.

Impact on Wildlife

Projected mineral exploration and development would cause some disturbance of wildlife habitat in the southeastern portion of the WSA. No identified populations of big game use this area and therefore these impacts would be minimal.

Conclusion: Mineral exploration and development in the southeastern portion of the WSA would have minimal impact on wildlife habitat.

Bill Hare Gulch (CO-030-085)

Proposed Action (No Wilderness Alternative)

Impacts on Wilderness Values

The wilderness values on 370 acres of Bill Hare Gulch exist only where considered in combination with the adjacent Big Blue Wilderness. No development or exploration of any kind is projected to occur in the WSA and therefore these wilderness values are expected to remain unaffected. They would not, however, receive the long term protection provided by wilderness designation.

Conclusion: No protection will be provided, however, wilderness values are not expected to be affected by non-designation.

Impacts on Mineral Resource Development

All of the WSA would remain open to mineral entry. However, the entire area is considered low in mineral potential and no development is anticipated.

Conclusion: Mineral resource development would not be affected by non-designation since no development is predicted.

Impacts on Recreation Use

The entire area would continue to be managed in a backcountry setting. Use would continue to be primarily on the access trail to the Big Blue Wilderness. Use would likely increase somewhat as use of the Big Blue increases but should not exceed 100 RUD annually.

Conclusion: Recreation use would continue to be for access to the Big Blue Wilderness and should not exceed 100 RUDs.

All Wilderness Alternative

Impacts to Wilderness Value

Wilderness values on all 370 acres would be provided by the protection afforded by wilderness designation. These values of naturalness, solitude and primitive and unconfined recreation, which exist only in combination with the Big Blue Wilderness, would be protected in the long term.

Conclusion: Wilderness values on 370 acres would be protected on the long term.

Impacts on Mineral Resource Development

The entire 370 acres would be withdrawn from mineral entry. Since the potential of this area for discovery is low and no developments are projected there would be no impact on mineral resource development. Any unknown or undiscovered minerals would be foregone.

Conclusion: Exploration would be foregone. Since the potential is low

there would be no impact on mineral resource production.

Impacts on Recreation Use

Wilderness designation would assure the continuation of a backcountry recreation setting. The area would continue to be used primarily for the access trail to the Big Blue Wilderness. Designation would not change use patterns or amounts estimated to be 100 RUDs within the 370 acres of the WSA itself.

Conclusion: Designation would protect the existing setting but would not affect use within the WSA. Use would remain at about 100 RUDs.

Wilderness Manageability Alternative

Impacts on Wilderness Values

Wilderness values on 325 acres recommended as suitable would be afforded the protection provided by wilderness designation the wilderness values on the remaining 45 acres would not be protected by designation. However, no development or other activities are projected that would diminish the existing values on these acres.

Conclusion: Wilderness values would be legislatively protected on 325 acres. Values are not expected to be impacted on the remaining 45 acres.

Impacts on Mineral Resource Development

The 325 acres recommended as suitable would be withdrawn from mineral entry. However, since the potential for discovery is low and no developments are projected, designation would not affect mineral development. Any undiscovered minerals would be foregone. The 45 acres recommended as nonsuitable would remain open to entry although no development or exploration is projected.

Conclusion: No impact on mineral development is expected in the suitable or nonsuitable portions of the WSA.

Impacts on Recreation Use

The entire area, including the 325 acres recommended suitable and 45 acres recommended nonsuitable, would continue to be managed to maintain a backcountry recreation setting. Use would continue to be primarily for access along the existing trail to the Big Blue Wilderness. Designation would not change use patterns or amounts (about 100 RUDs) within the WSA.

Conclusion: The recreation setting would not change in either the suitable or nonsuitable areas. Use patterns or amounts (100 RUDs) would not change as a result of designation or non-designation.

Larson Creek (CO-030-086)

Proposed Action (No Wilderness Alternative)

Impacts on Wilderness Values

The wilderness values on 900 acres of Larson Creek exist only when considered in combination with the adjacent Big Blue Wilderness. No development or exploration of any kind is projected to occur in the WSA and therefore these wilderness values are expected to remain unaffected. They would not, however, receive the long term protection provided by wilderness designation.

Conclusion: Although no protection would be provided wilderness values are not expected to be affected by

non-designation.

Impacts on Mineral Resource Development

All 900 acres of the WSA would remain open to mineral entry. However, the entire area is considered low in mineral potential and no development is anticipated.

Conclusion: Mineral resource development is not expected to be affected by non-designation since no development is predicted.

Impacts on Recreation Use

The entire area would continue to be managed in a backcountry setting. Use would continue to occur primarily in conjunction with the adjacent Big Blue Wilderness. Little change in the current 20 RUD is expected.

Conclusion: Recreation use would remain at about 20 RUD.

All Wilderness Alternative

Impacts to Wilderness Value

Wilderness values on all 900 acres would be provided the protection afforded by wilderness designation. These values of naturalness, solitude and primitive and unconfined recreation which exist only in combination with the Big Blue Wilderness, would be protected in the long term.

Conclusion: Wilderness values on 900 acres would be protected on the long term.

Impacts on Mineral Resource Development

The entire 900 acres would be withdrawn from mineral entry. Since the potential of this area for discovery is low and no developments are projected there would be no impact on mineral resource development. Any undiscovered minerals would be foregone.

Conclusion: Exploration would be foregone. Since the potential is low there would be no impact on mineral resource production.

Impacts on Recreation Use

Wilderness designation would assure the continuation of a backcountry recreation setting. The area would continue to be used primarily in conjunction with the adjacent Big Blue Wilderness. Designation would not change use patterns or amounts (about 20 RUDs) within the 900 acres of the WSA itself.

Conclusion: Designation would protect the existing setting but would not affect use (about 20 RUDs) within the WSA.

Wilderness Manageability Alternative

Impacts on Wilderness Values

Wilderness values on 480 acres recommended as suitable would be afforded the protection provided by wilderness designation the wilderness values on the remaining 420 acres would not be protected by designation. However, no development or other activities are projected that would diminish the existing values on these acres.

Conclusion: Wilderness values would be legislatively protected on 480 acres. Values would not be protected on the remaining 420 acres but they are not expected to be affected by non-designation.

Impacts on Mineral Resource Development

The 480 acres recommended as suitable would be withdrawn from mineral entry. However, since the potential for discovery is low

and no developments are projected, designation would not affect mineral development. Any undiscovered minerals would be foregone. The 420 acres recommended as nonsuitable would remain open to entry although no development or exploration is projected.

Conclusion: No impact on mineral development or exploration in the suitable or nonsuitable portions of the WSA is expected.

Impacts on Recreation Use

The entire area, including the 480 acres recommended suitable and 420 acres recommended nonsuitable, would continue to be managed to maintain a backcountry recreation setting. Use would continue to be primarily in conjunction with the adjacent Big Blue Wilderness. Little change in the existing 20 RUD is expected.

Conclusion: The recreation setting would not change in either the suitable or nonsuitable areas. Use patterns or amounts (20 RUDs) would not change as a result of designation or non-designation.

SHORT TERM USES vs LONG TERM PRODUCTIVITY: IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

A discussion of the short term uses in each WSA and their relation to long term productivity as well as any irreversible or irretrievable commitment of resources is presented in Table 4-1.

TABLE 4-1

Short Term Uses vs. Long Term Productivity;

Irreversible/Irretrievable Commitments of Resources

WSA/ Alternative	Short-Term Uses vs. Long Term Productivity	Irreversible/Irretrievable Commitments of Resources
Redcloud Peak		
Proposed Action	Within the suitable portion wilderness values would be protected in the short and long term. Mineral resources not covered by valid existing rights would be foregone in the long term on 28,400 acres. In the nonsuitable portion long term productivity of alunite if developed would occur.	In the nonsuitable portion potential development of alunite would result in the irreversible and irretrievable loss of wilderness values on about 495 acres.
All Wilderness	Wilderness values would be protected in the long term except where valid mineral rights occur. Minerals not covered by valid existing rights would be unavailable in the long term.	There would be no irreversible or irretrievable commitment of resources.
No Wilderness	In the long term wilderness values would eventually be lost on the entire area. Long term productivity of mineral resources would be assured.	Development of alunite would result in the irreversible and irretrievable loss of wilderness values. Development of other mineral resources could also result in the irreversible and irretrievable loss of wilderness values. Total acres irreversibly or irretrievably lost would be 585 acres.

Wilderness Manageability	This would be the same as under the All Wilderness Alternative although slightly less acreage (37,530) would be protected.	This would be the same as under the All Wilderness.
Conflict Resolution II	This would be the same as the Proposed Action except only 11,140 acres would receive wilderness protection.	This would be the same as the Proposed Action.
Handies Peak		
Proposed Action	Within the suitable portion wilderness values would be protected in the short and long term on 7,885 acres. Mineral resources not covered by valid existing rights would be foregone in the long term. In the nonsuitable portion long term productivity of mineral resources would be provided for.	Mineral development in both the suitable and nonsuitable portion would result in the irreversible and irretrievable loss of wilderness values. on 35 acres.
All Wilderness	Wilderness values on 18,860 acres would be protected in the long term except where valid existing rights occur. Minerals not covered by valid existing rights would be unavailable in the long term.	There would be no irreversible or irretrievable commitment of resources.
No Wilderness	In the long term wilderness values would be lost on 1,400 acres due to mineral development. Long term productivity of minerals would be assured.	Mineral development could result in the irreversible and irretrievable loss of wilderness values on 115 acres.

Wilderness Manageability	This would be the same as the Proposed Action except the acreage would be 8,220.	This would be the same as the Proposed Action.
American Flats		
Proposed Action	Within the 1,505 acre suitable portion wilderness values would be protected in the long term and mineral resources would be foregone in the long term. In the nonsuitable portion mineral productivity would be assured. Some loss of wilderness values would occur.	Mineral exploration and development in the non-suitable portion could result in an irreversible loss of wilderness values on 35 acres.
All Wilderness	Wilderness values would be protected in the long term and subject to valid existing rights, productivity of mineral resources would be foregone.	There would be no irreversible or irretrievalbe commit-ment of resources.
No Wilderness	Mineral productivity would be assured in the long term. Some wilderness values could be lost on 370 acres due to mineral explor-ation and development.	Continued mineral exploration and develop-ment could result in an irreversible and irretrievable loss of wilderness values on 35 acres.
Bill Hare Gulch		
Proposed Action	Long term protection of wilderness values on 370 acres would not be assured.	There would be no irreversible or irretrievable commitment of resources.
All Wilderness	Protection of wilderness values on 370 acres would be assured in the long term.	Some as the Proposed Action.

Wilderness Manageability	Protection of wilderness values would be assured in the long term for 345 acres in the suitable portion, but not for the nonsuitable portion.	Same as the Proposed Action.
Larson Creek		
Proposed Action	Long term protection of wilderness values on 900 acres would not be assured.	There would be no irreversible or irretrievable commitment or resources.
All Wilderness	Protection of wilderness values on 900 acres would be assured in the long term.	Same as the Proposed Action.
Wilderness	Protection of wilderness values would be assured in the long term for 480 acres within the suitable portion, but not in the nonsuitable portion.	Same as the Proposed Action.

CHAPTER 5

CONSULTATION AND COORDINATION

Development of the recommendations for the Gunnison Basin and American Flats/Silverton Wilderness Final EIS has involved ongoing coordination and consultation with individual agencies and organizations. The early phase of the study included a scoping process designed to identify issues to be addressed in the EIS.

SCOPING

A series of scoping and issue identification meetings were held in early 1981 in Gunnison, Montrose, Lake City, Silverton and Denver, Colorado. These meetings were used to identify any new issues, solicit resource data from the public, and explain the study procedures. As a result of these meetings as well as internal input the following issues were identified.

1. Effects of designation or non-designation on wilderness values.
2. Effects of designation on development of mineral resources.
3. Effects of designation or non-designation on recreation use.
4. Effects of designation on access to inholdings.
5. Effects of access needs on wilderness values.
6. Effects of designation or non-designation on water quality.
7. Effects of designation or non-designation on soil erosion.
8. Effects of designation or non-designation on wildlife.
9. Effects of designation or non-designation on air quality.
10. Effects of designation on livestock operations.
11. Effects on cultural resources.
12. Effects of designation on our quality classification.

Chapter 1 describes each of these in detail, identifies which WSA each applies to and which were ultimately determined not to be issues.

A second series of scoping meetings were held in August of 1981 to present the proposed alternatives to be considered for each or the WSAs. Information obtained at these meetings was used to develop the alternatives including the proposed action as presented in the Draft EIS.

REVIEW OF THE DRAFT EIS

The Draft EIS was completed and made available to the public in March of 1982. The Draft EIS was sent to the following agencies, organizations and individuals. Those providing a response are indicated with an asterisk.

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
*Forest Service
Soil Conservation Service
Department of Energy
Department of the Interior
*U.S. Fish and Wildlife Service
Bureau of Reclamation
Geological Survey
Bureau of Mines
*National Park Service
*Environmental Protection Agency
*Department of Defense - USAF

State Agencies

*Governor's Clearing House--Colorado

Local Agencies

County Commissioners
La Plata County
Ouray County
Gunnison County
*Hinsdale County
San Juan County
Saguache County
Montrose County

Region 10 Planning Commission

Other Organizations and Individuals

*Sierra Club
*Colorado Open Space Council
National Wildlife Federation
Colorado Cattlemen's Association
Colorado Wool Grower's Association
*Audubon Society
Natural Resources Defense Council
Society for Range Management
*The Wilderness Society
Rocky Mountain Center on Environment
Trout Unlimited
*Colorado Historical Society
National Council of Public Land Users
*Colorado Outward Bound School
*American Wilderness Alliance
American Mining Congress
Aspen Wilderness Workshop
Club 20
Colorado Association 4WD Clubs
Colorado Farm Bureau
*Colorado Mining Association
*Colorado Mountain Club
Colorado Outfitter and Ranch Enterprise
University of Colorado, Environmental Center
*Wilderness Study Group, University of Colorado
Colorado State University
Conservation Library
Delta-Montrose Electric Association
Western Colorado Congress
Federal Timber Purchaser's Association
Gunnison County Farm Bureau
Gunnison County Stockgrowers
University of Illinois
Institute of Ecology
University of Minnesota
Montrose Chamber of Commerce
Montrose County Farm Bureau
Northwestern University
Outdoor Pursuits
Public Lands Institute
San Miguel Citizen's Alliance
Tri River Extension Service
Uncompahgre Resource Council
Chardron State College
Western Slope Energy
Western State College
Wildlife Management Institute
All Livestock Grazing Permittees in the EIS Area
Various Individuals Who Have Requested Copies of All BLM Environmental Documents

A total of 149 comments were submitted, both oral and written, on the Gunnison Basin and American Flats/Silverton draft wilderness environmental impact statement during the 90-day public comment period which ended July 8, 1982. Formal public hearings were held on May 10, 1982 in Lake City, Colorado, May 11, 1982 in Silverton, Colorado, and May 13, 1982 in Denver, Colorado. All hearings began at 7:00 p.m. and were announced through a news release, personal communication, and in the Federal Register (Vol. 47, No. 69).

The order of speakers at the public hearings follow:

Monday, May 10, 1982
Lake City, Colorado 81235

Speaker	Representing
Charles, Dustin*	Self
Chap, Rowe	Hinsdale County Planning Commission
Joel Swank	Self
John Sisk	Uncompahgre Resource Council
Nancy Kelso	Self
Perk Vickers	Self
John Parker	Self
Norma Swanson*	Hinsdale County Wilderness Alliance
Bruce Vierheller	Self

Tuesday, May 11, 1982
Silverton, Colorado

Speaker	Representing
J.R. Guadagon*	Self
Gerry Swenson	Town of Silverton
Pat Degrave	Sierra Club
John Baldus*	Uncompahgre Resource Council
W. Glen Phillips	Colorado Mountain Club
Jeanne Hemphill	Audobon Society

Thursday, May 13, 1982
Denver, Colorado

Speaker	Representing
Gordon L. Pine	Minerals Exploration Coalition
Douglas Smith, Jr.	Self
Norm Mullen*	Colorado Open Space Council
Doug Hirschman*	Mapco Minerals Corp.
Jon Stansfield	Sierra Club
George Saum	Colorado Mountain Club
Mark Pearson	Univ. of Colo. Wilderness Study Group
Willy Lynch	Noranda Exploration, Inc.
James Gehres	Self
Ted Kerasote	Sports and Field Magazine
Gary Goss	Self
Mery Gilbert	Colorado Mountain Club
Carl Hinrichs	Colorado Mountain Club
Rosalind McClellan*	Colorado Wilderness Network
Marion Senior	Colorado Mountain Club
Kim McLacklin	Self
Roger Fuehrer*	Self
Ron Sinton	Self
David Kopec	Self
Mark Udall	Colorado Outward Bound School
Chris Citnon	Self
Bernard Zelyman	Self
John Fredickson	Self
Lucy Bambrey	Self
Ralph Palmer	Self
Darrel Anderst	Sierra Club
Joann Senior	Self

The written comments received by BLM are as follows:

Federal Agencies

1 Dept. of the Air Force, Environ, Planning Div.; Major Paul Garcia*
2 National Park Service; Richard A. Strait*
3 Grand Mesa, Uncompahgre & Gunnison Nat'l Forests; Jimmy Wilkins
4 U.S. Environmental Protection Agency; Steven J. Durham*
4a Fish & Wildlife Service

State Agencies

5 State of Colorado Dept. of Natural Resources; D. Monte Pascoe
6 Colorado Historical Society, Arthur C. Townsend*
7 Colorado Water Conservation Board, E.I. Jencsok*
8 Colorado Natural Areas Program, Carse Pustmueller*
9 Division of Wildlife, Don Smith*
10 Division of Water Resources, Hal D.Simpson*
11 Colorado Geological Survey, A.L. Hornbaker
12 Colorado Dept. of Health; Thomas Lodoy & Tom Bennett

Local Agencies

13 Hinsdale County Planning Commission; Chap Rowe

Groups and Organizations

14 Colorado Mountain Club; Larry Ferguson
15 San Juan Audobon Society; Jeanne T. Hemphill*
16 Colorado Wilderness Network; Rosalind McClellan*
17 Colorado Mountain Club; George H. Saum
18 Colorado Mining Assn; John R. Henderson*
19 Colorado Wilderness Network includes: Norm Mullen, Colorado Open Space; Michael Scott, The Wilderness Society; Marty Sorensen, Sierra Club; Mark Pearson, CU Wilderness Study Group*
20 National Audobon Society; Pauline F. Plaze
21 Uncompahgre Resource Council; John R. Baldus*
22 American Wilderness Alliance; Jeff Rennicke
23 Gunnison Country Friends of the Earth; Gary Sprung*
24 Colorado Wilderness Network; Rosalind McClellan*
25 Colorado Outward Bound School; Mark Hesse
Includes individual letters from:
Bev Tompkins
Dennis Medgorden
Mike Wayne Black
Kevin Christopher Elliott
Paul G. Curtin
Doug Hagman
Mark Franko
Jose Garcia
Rick Phillips
John Wolf
Consuelo Loero
Randy Rozzell
Will Gillespie
Chris Schultz

Peggy Ann Lassell
Sanford Israel

Companies

26 MAPCO Minerals, Corp.; Doug Hirschman*
27 Baumgartner Mining Div.; Adrain W. VanderPyl
28 Colorado-Ute Electric Assn; Jerry A. Walker
29 Anasazi Security Inc; Bradley L. Matoush
30 Atlantic Richfield Co.; J.R. Mitchell
31 AMAX Inc.; David W. Delcour*

Individuals

32 Robert W. Virtue
33 Pam Marencik
34 Bill & Kathy Tembrock
35 Marilyn Hackett
36 Judith Caro
37 Sharon Konen Bosier
38 Suzanne H. Kaempfer
39 Stephen L. & Susan D. Gilsdorf
40 Nina Johnson
41 Robin Liggett
42 Mary S.Caton & Jerry Rosser
43 William M. Folger
44 Anne Vickery
45 Dr. & Mrs. Glenn Cushman
46 Mrs. Elizabeth C. Bosely
47 Jane E. Schleimer
48 Jean Glebe
49 Bea Collins
50 Paul W. Winston*
51 Donald G. Parker
52 Ms. Chris Seitz
53 Ruth V. Hehann
54 Beverely & Tony Baker
55 Rev. Mark Meeks
56 Kaye Bache-Snyder
57 John W. Spezea
58 Bradley Edwards
59 Thomas Ward
60 Henry E. Ervin
61 Minerva C. Canavan
62 Mrs. R.A. Kilgore
63 Gertrud Nuhn
64 David F. Steinhoff
65 Linda Pohle
66 Peri Chickering
67 Lynn S. Cudlip
68 Carol Nibick
69 John M. Wade
70 Diane L. Skinner
71 Clinton D. Nagel*
72 Rocky Smith

73 Ed Logsdon
74 Johnnie Murphy
75 Ralph E. Palmer
76 Henry Woods*
77 Philippa Eggleston
78 Janet McLachlan
79 Ralph E. Clarke III
80 John R. Swanson
81 Donald E. Potter, M.D.
82 David R. Purcell
83 Kirk Cunningham
84 Don Thompson
85 Steve Bortz
86 Richard F. Grote
87 Donald H. Deane
88 John M. Wade
89 Laurie Thayer
90 Connie Sheridan
91 Sara Smock
92 Pamela Kline

* Response made by BLM

RESPONSE TO COMMENTS ON DEIS

All substantive comments are addressed in the following section. In some cases changes were made in the text to correct errors identified by the respondent.

All of the comments received are included in this section of the Final EIS. Each comment requiring a response is marked and numbered in the margin. The response to all comments by any one respondent is printed immediately following that individuals statement or letter.

DEPARTMENT OF INTERIOR

BUREAU OF LAND MANAGEMENT

MONTROSE DISTRICT OFFICE

REPORTER'S TRANSCRIPT

IN RE:

PUBLIC HEARING

ON

THE GUNNISON BASIN AND AMERICAN

FLATS/SILVERTON WILDERNESS

IMPACT STATEMENT

THE ABOVE-ENTITLED MATTER CAME ON FOR A PUBLIC HEARING AT THE LAKE CITY COMMUNITY CENTER, LAKE CITY, COLORADO, COMMENCING AT 7:10 P.M., MONDAY, MAY 10, 1982 ~~1980~~, WITH MR. BOB SCHMIDT, ASSOCIATE DISTRICT MANAGER OF THE BUREAU OF LAND MANAGEMENT, PRESIDING.

ALSO PRESENT: TERRY REED, AREA MANAGER

JON SERING, WILDERNESS COORDINATOR

LANCE NIMMO, TEAM LEADER

MR. SCHMIDT: LADIES AND GENTLEMEN, I THINK WE ARE READY TO BEGIN.

THIS IS THE HEARING ON THE GUNNISON BASIN AND AMERICAN FLATS/SILVERTON WILDERNESS AMENDMENT ENVIRONMENTAL IMPACT STATEMENT.

MY NAME IS BOB SCHMIDT. I'M THE ASSOCIATE DISTRICT MANAGER OF THE MONTROSE DISTRICT OF THE BUREAU OF LAND MANAGEMENT. I HAVE BEEN ASKED TO PRESIDE OVER THIS HEARING.

A HEARING PANEL HAS BEEN DESIGNATED TO HEAR YOUR COMMENTS. ON MY LEFT, TERRY REED, AREA MANAGER, GUNNISON BASIN RESOURCE AREA, MONTROSE DISTRICT. LANCE NIMMO, TEAM LEADER, PLANNING AND ENVIRONMENTAL COORDINATION STAFF, MONTROSE DISTRICT, MONTROSE, COLORADO. JON SERING, WILDERNESS COORDINATOR, DIVISION OF RESOURCES, MONTROSE DISTRICT, BUREAU OF LAND MANAGEMENT, MONTROSE, COLORADO.

THIS HEARING IS A PUBLIC HEARING FOR THE BUREAU OF LAND MANAGEMENT OF THE DEPARTMENT OF INTERIOR. THE HEARING HAS BEEN SCHEDULED TO RECEIVE COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT PREPARED BY THE BUREAU OF LAND MANAGEMENT CONCERNING THE PROPOSED WILDERNESS DESIGNATION OF SEVEN WILDERNESS STUDY AREAS IN THE GUNNISON BASIN AND AMERICAN FLATS/SILVERTON PLANNING PLANNING AREA IN THE MONTROSE

DISTRICT. MEMBERS OF THE HEARING PANEL ARE HERE TO LISTEN TO YOUR VIEWS. THEY ARE NOT HERE TO ANSWER QUESTIONS WHILE THE HEARING IS IN SESSION. THEY MAY, HOWEVER, ASK CLARIFYING QUESTIONS AT THE CONCLUSION OF YOUR REMARKS. THE PANEL WILL BE AVAILABLE DURING RECESS IN THE HEARINGS, AND THEY WILL AT THAT TIME WELCOME AND ATTEMPT TO ANSWER ANY QUESTIONS YOU MIGHT HAVE. A FORMAL RESPONSE TO YOUR COMMENTS AND QUESTIONS WILL BE CONTAINED IN THE FINAL ENVIRONMENTAL IMPACT STATEMENT.

AN OFFICIAL REPORTER WILL MAKE A VERBATIM TRANSCRIPT OF THE HEARING. TO INSURE A COMPLETE, AND ACCURATE RECORD, IT IS ABSOLUTELY NECESSARY THAT ONLY ONE PERSON SPEAK AT A TIME, AND THAT EVERYONE REMAIN AS QUIET AS POSSIBLE WHILE THE HEARING IS IN PROGRESS. DURING THE HEARING, NO ONE WILL BE RECOGNIZED OTHER THAN THE DESIGNATED SPEAKER AND MEMBERS OF THE HEARING PANEL.

THIS HEARING IS SCHEDULED FOR TONIGHT IN LAKE CITY, TOMORROW NIGHT IN SILVERTON, AND THURSDAY NIGHT IN DENVER.

THE SPEAKERS WILL BE CALLED IN THE ORDER OF THE REQUESTS TO SPEAK HAVE BEEN RECEIVED.

ALL PARTIES WILL BE EXPECTED TO CONFINE THEIR REMARKS TO TEN MINUTES OR LESS. THIS TIME LIMIT

WILL BE ENFORCED IN ORDER TO INSURE THAT EVERYONE IS TREATED IN AN EQUAL MANNER. WRITTEN COMMENTS WILL BE ACCEPTED IN LIEU OF ORAL PRESENTATIONS OR AS SUPPLEMENTS TO ORAL STATEMENTS. THEY CAN BE SUBMITTED DURING THE COURSE OF THE HEARING OR AT ANY TIME BETWEEN NOW AND JULY 8TH, 1982, INSOFAR AS THIS ENVIRONMENTAL IMPACT STATEMENT IS CONCERNED. IF WRITTEN COMMENTS ARE NOT SUBMITTED TODAY, THEY SHOULD BE ADDRESSED TO THE DISTRICT MANAGER, MONTROSE DISTRICT OFFICE, BUREAU OF LAND MANAGEMENT, P.O. BOX 1269, MONTROSE COLORADO 81402. ALL WRITTEN STATEMENTS THAT ARE TIMELY RECEIVED WILL BE INCLUDED AS A PART OF THE HEARING RECORD. WRITTEN STATEMENTS WILL BE GIVEN THE SAME WEIGHT AS ORAL STATEMENTS MADE AT THE HEARING.

FOR THOSE WHO ARE GOING TO MAKE AN ORAL PRESENTATION, IT WILL BE HELPFUL IF THE REPORTER CAN OBTAIN A COPY OF ANY PREPARED STATEMENT THAT YOU MIGHT HAVE PRIOR TO THE PRESENTATION OF THE STATEMENT. IF YOU HAVE AN EXTRA COPY, WILL YOU PLEASE GIVE IT TO THE REPORTER JUST PRIOR TO YOUR PRESENTATION. IF YOU DO NOT HAVE AN EXTRA COPY, IT WILL STILL BE HELPFUL IF YOU CAN LEAVE A COPY OF THE WRITTEN STATEMENT WITH THE REPORTER AFTER YOUR PRESENTATION. HE HAS ASSURED ME THAT IF YOU WILL PLACE YOUR NAME, AND ADDRESS ON -- IF YOU PLACE YOUR NAME AND ADDRESS ON THE STATEMENT, HE

WILL RETURN IT TO YOU.

TO THE EXTENT THAT TIME IS AVAILABLE AFTER THE PRESENTATION OF ORAL STATEMENTS BY THOSE ON THE LIST OF SPEAKERS, WE WILL GIVE OTHERS PRESENT AN OPPORTUNITY TO BE HEARD. IF THERE ARE ANY PARTIES WHO DO -- WHO ARE NOT ON THE SPEAKER'S LIST WHO DESIRE TO BE HEARD, THEY SHOULD REGISTER AT THE REGISTRATION TABLE AT THE REAR HERE.

THE RECORD OF THIS HEARING, INCLUDING ALL TIMELY FILED WRITTEN STATEMENTS, WILL BE AVAILABLE FOR PUBLIC INSPECTION AT THE COLORADO STATE OFFICE OF THE BUREAU OF LAND MANAGEMENT AT 1037 20TH STREET, DENVER, COLORADO, AND AT THE MONTROSE DISTRICT OFFICE OF THE BUREAU OF LAND MANAGEMENT ON HIGHWAY 550 SOUTH IN MONTROSE, COLORADO.

COPIES OF THE TRANSCRIPT OF THIS HEARING CAN BE OBTAINED BY MAKING ARRANGEMENTS WITH THE REPORTER.

AT THE PRESENT TIME, I HAVE THE FOLLOWING NAMES ON THIS SPEAKER'S LIST. CHARLES DUSTIN, CHAP ROME, JOEL SWANK, JOHN SISK, NANCY KELSO, PERK VICKER, JOHN PARKER, AND NORMA SWANSON. WE WILL PROCEED WITH THOSE IN THAT ORDER, AND THEN PICK UP ANY OTHER PEOPLE THAT MAY WISH TO SPEAK.

THE FIRST SPEAKER TONIGHT WILL BE MR. DUSTIN.

MR. DUSTIN: FIRST OF ALL, I OBJECT TO THE SETUP YOU HAVE GOT HERE, IT PUTS THE PUBLIC AT A DISADVANTAGE, BECAUSE HERE YOU GOT A BIG TABLE, AND EVERYTHING, AND YOUR SITTING THIS ALMOST LIKE A TRIBUNAL, AND I DON'T WANT TO LIKE STAND UP LIKE I'M A SCHOOLBOY AND MAKE MY PRESENTATION.

I WONDER IF I COULD HAVE LIKE A LITTLE SPACE IN WHICH I COULD LAYOUT MY EXHIBITS AND MY SPEECH?

MR. SCHMIDT: DO YOU HAVE YOUR EXHIBITS SET?

MR. DUSTIN: YES, RIGHT HERE.

MR. SCHMIDT: HOW DO YOU WANT TO --

MR. DUSTIN: WHY DON'T YOU AT LEAST TAKE THIS TABLE THAT THE SPEAKERS COULD USE AND PERHAPS LAY THEIR SPEECH ON.

MR. SCHMIDT: WOULD YOU PREFER TO DO THAT?

MR. DUSTIN: YES.

MR. SCHMIDT: I HAVE NO PROBLEM.

MR. DUSTIN: I SUPPOSE I COULD PUT SOME OF THESE PHOTOGRAPHS PERHAPS RIGHT HERE ALONG THE BLACKBOARD. LET'S SEE HERE. THEY ILLUSTRATE SOME OF THE MATTERS THAT I WISH TO DISCUSS. LET'S SEE, WOULD YOU HELP ME LIKE THIS UP HERE? LET'S JUST -- WELL, LET ME THINK, DAVE. LET'S GO THIS WAY. I'M NOT SURE THEY

WILL. THERE WE GO.

NOW, I WILL READ FROM THE SPEECH, BUT I MIGHT STOP, AND MAKE SOME REFERENCE TO THE PHOTOS.

WHERE ONCE THERE WAS AN EMPIRE OF SILVER, THE MONTROSE DISTRICT OFFICE OF THE BUREAU OF LAND MANAGEMENT NOW PROPOSES TO CREATE THEIR OWN FIEFDOM, AN EMPIRE OF WILDERNESS. THE COST TO THE AMERICAN TAXPAYER OF INDULGING THE BUREAUCRATS IN THAT FANTASY WILL BE ENORMOUS. MILLIONS WILL BE SPENT FOR LAND ACQUISITION AND LAND RECONSTRUCTION TO WILDERNESS STANDARDS. THE LOSS TO THE NATION OF ITS STRATEGIC AND CRITICAL MINERAL RESOURCE POTENTIAL CANNOT BE MEASURED IN DOLLARS. IT WILL BE MEASURED AT SOME FUTURE DATE WHEN THE NATION CAN NO LONGER DEPEND ITSELF DUE TO THE FACT THAT ITS LEAD, ZINC, COPPER, COBALT, NICKEL, SILVER AND OTHER RAW MATERIALS ARE ALL LOCKED UP IN WILDERNESS AREAS. I CAN HEAR THE APPLAUSE FOR THIS IDEA COMING RIGHT NOW, FROM THE DISTANT SHORES OF THOSE WHO WOULD DESTROY US.

THIS PLAN HAD ITS BEGINNINGS BACK IN 1966 WHEN THE BUREAU OF LAND MANAGEMENT WITHDREW SOME 2,318 ACRES OF LAND ALONG THE PRINCIPAL COUNTY ROADS OF HINSDALE AND SAN JUAN, ALLEGEDLY FOR PROTECTION OF RECREATION VALUES. THE NET EFFECT OF THIS WITHDRAWAL WAS TO BUILD A CHAIN LINK FENCE AROUND THE MAIN ACCESS

ROADS OF HINSDALE COUNTY. OWNERS OF PRIVATE PROPERTY HAVE BEEN STRIPPED OF THEIR CONSTITUTIONAL RIGHTS OF ACCESS TO AND ENJOYMENT OF THEIR PROPERTY. THE ROAD WITHDRAWAL IS BEING USED TO HINDER AND RESTRICT MINERAL EXPLORATION EFFORTS. THE FULL IMPACT OF THE 1966 ROAD WITHDRAWAL, PUBLIC LAND ORDER 3983, WAS NEVER DISCUSSED OR REVEALED TO THE PUBLIC PRIOR TO ITS ENACTMENT.

LIKEWISE, THE FULL IMPACT OF THE GUNNISON BASIN, AMERICAN FLATS/SILVERTON WILDERNESS DRAFT ENVIRONMENTAL IMPACT STATEMENT IS BEING CONCEALED FROM THE AMERICAN PUBLIC. LET US CITE ONE EXAMPLE OF WHAT APPEARS TO BE A DELIBERATE CONCEALMENT OF FACT BY THE PREPARERS OF THIS DOCUMENT. ON PAGE 83, UNDER THE HEADING, HANDIES PEAK-NO WILDERNESS ALTERNATIVE-IMPACT ON MINERALS, THE FOLLOWING STATEMENT APPEARS:

"EXPLORATION OF AREAS OF IDENTIFIED MINERAL POTENTIAL COULD EVENTUALLY LEAD TO PRODUCTION OF RAW MATERIALS NECESSARY TO STIMULATE THE ECONOMIC WELL-BEING OF LOCAL COMMUNITIES AND IN THE STATE OF COLORADO" --

FOOTNOTE. I KNOW THAT NO ONE ON THE WEST SLOPE NEEDS ANY STIMULATION OF THE ECONOMIC WELL-BEING, WE ARE ALL DOING SO WELL.

-- "AND POSSIBLY THE NATION AS A WHOLE, SINCE SOME OF THE IDENTIFIED COMMODITIES IN THIS AREA

9

ARE PRESENTLY IMPORTED."

THE TERMINOLOGY, "IDENTIFIED COMMODITIES ... PRESENTLY IMPORTED" HAS BEEN USED IN AN EFFORT TO CONCEAL FROM THE AMERICAN PUBLIC THAT COBALT AND NICKEL ARE BOTH STRATEGIC AND CRITICAL METALS ABSOLUTELY ESSENTIAL TO THE NATIONAL DEFENSE REQUIREMENTS OF THE UNITED STATES. BY ATTEMPTING TO CONCEAL THIS FACT, THE MONTROSE DISTRICT OFFICE, WITH THE APPROVAL OF THE COLORADO STATE OFFICE, REVEALED THEIR OPPOSITION TO PRESIDENT REAGAN'S POLICY STATEMENT INTENDED TO STIMULATE THE DOMESTIC MINING INDUSTRY AND REDUCE U.S. DEPENDENCE ON POTENTIALLY UNSTABLE FOREIGN SOURCES FOR MINERALS ESSENTIAL TO THE NATIONAL DEFENSE.

NOW, I WILL TAKE THIS ITEM BY ITEM, SOME CRITICISMS OF THE DEIS. AS FAR AS THE MAP IS CONCERNED, WHICH IS AN INSERT IN THE DOCUMENT, STATE OWNED MINERAL TRACTS LOCATED IN TOWNSHIP 42 NORTH, RANGE 5 WEST, ARE MISSING.

1

NUMBER TWO, THE LOCATIONS OF PRIVATELY OWNED LAND ARE NOT ACCURATELY PORTRAYED. AN EXAMPLE, THE AREA SOUTH OF CINNAMON PASS IN TOWNSHIP 43 NORTH, RANGE 6 WEST.

2

GLOSSARY. THERE IS NO DEFINITION OF CRITICAL MINERAL RESOURCES.

LIST OF PREPARERS, PAGES 120 TO 122. NO

10

INDIVIDUAL HERE HAD EITHER THE NECESSARY ACADEMIC BACKGROUND OR WORK EXPERIENCE TO MAKE COMPETENT DECISIONS CONCERNING CRITICAL AND STRATEGIC MINERAL RESOURCE VALUES. FOR EXAMPLE, SUCH DECISIONS SHOULD ONLY BE MADE BY AN INDIVIDUAL WITH THE EQUIVALENT OF A PHD IN MINERAL ECONOMICS.

NOW, TABLE 4-1, COMPARATIVE ANALYSIS MATRIX OF IMPACTS, SHORT TERM VERSUS LONG TERM USE, IRREVERSIBLE-IRRETRIEVABLE COMMITMENT OF RESOURCES, UNDER THE HEADING, "IF NO WILDERNESS DESIGNATION IS MADE", PAGES 104 TO 117, THE FOLLOWING STATEMENT APPEARS NO LESS THAN TWELVE TIMES.

"SHOULD MINERAL EXPLORATION AND DEVELOPMENT OCCUR, IRREVERSIBLE TRENDS WOULD BE ESTABLISHED, AND THE LOWERING AND DEGRADATION OF WILDERNESS RESOURCE VALUES WOULD BE IRRETRIEVABLE."

THE ABOVE STATEMENT IS FALSE. MOST OF THE LANDS BEING RECOMMENDED FOR WILDERNESS DESIGNATION HAVE BEEN THE FOCUS OF MINERAL EXPLORATION EFFORTS FROM 1876 TO THE PRESENT, WITHOUT ESTABLISHING ANY IRREVERSIBLE TREND. BY MAKING SUCH A STATEMENT, THE PREPARERS OF THIS DRAFT ENVIRONMENTAL IMPACT STATEMENT EXHIBIT AN INTENSE PREJUDICE AGAINST THE AMERICAN MINING INDUSTRY AND A TRAGIC IGNORANCE OF THE ROLE THAT INDUSTRY PLAYS IN THE PRODUCTION OF CRITICAL AND STRATEGIC MINERALS

11

NECESSARY TO THE DEFENSE OF OUR DEMOCRACY.

NOW, PRIVATE LAND INHOLDINGS, PAGE 6. "THE INCOMPATIBILITY OF THESE INHOLDINGS WITH WILDERNESS VALUES OF THE SURROUNDING PUBLIC LAND" -- NOW, THIS IS A QUOTE -- "MAY NECESSITATE THE NEED FOR LAND ACQUISITION AUTHORITY PURSUANT TO ANY APPLICABLE WILDERNESS LEGISLATION. ACQUISITION OF THESE INHOLDINGS WOULD NOT BE NECESSARY IF THE PROPERTIES WERE USED IN A MANNER COMPATIBLE WITH THE MANAGEMENT OF THE SURROUNDING WILDERNESS."

NUMBER ONE. IT'S NAIVE TO ASSUME THAT PRIVATE LANDOWNERS ARE GOING TO ACQUIESCE WITH THE BLM'S WILDERNESS CONCEPTS. I WOULD EXPECT THE REVERSE. PRIVATE LANDOWNERS ARE MORE LIKELY TO BEGIN EXERCISING THEIR RIGHTS OF OWNERSHIP, WHERE IN THE PAST, THEY MAY HAVE BEEN CONTENT JUST TO HOLD THE GROUND FOR INVESTMENT PURPOSES.

POINT NUMBER TWO. WHAT IS GOING TO BE THE COST TO THE TAXPAYERS OF ACQUIRING THESE PRIVATE LAND INHOLDINGS? ONE OF THESE TRACTS IS SUBJECT TO A REAL ESTATE SALES CONTRACT IN THE AMOUNT OF 7 MILLION DOLLARS. THE POTENTIAL COSTS OF ACQUISITION OF THESE PRIVATE LAND INHOLDINGS ARE NOT DISCUSSED OR REVEALED IN THE THIS DOCUMENT.

NOW, HANDING FROM WILDERNESS STUDY AREA,

12

PAGE 12. "THERE ARE APPROXIMATELY 50 ACRES OF PRIVATE LAND WITHIN THIS AREA. A VEHICLE WAY PROVIDES ACCESS TO A PORTION OF THESE LANDS. ALTHOUGH THE WAY WAS ORIGINALLY CONSTRUCTED, IT HAS NOT BEEN MAINTAINED TO INSURE REGULAR -- RELATIVELY REGULAR AND CONTINUOUS USE, AND THEREFORE CANNOT BE CONSIDERED A ROAD."

NOW, WHAT IS BEING CALLED A VEHICLE WAY APPEARS HERE ON THIS PARTICULAR AERIAL PHOTO. THAT STATEMENT IS MISLEADING. WHAT IS DESCRIBED AS A VEHICLE WAY WAS THE ORIGINAL COUNTY ROAD CONNECTING EARLY MINING CAMPS AT SHERMAN AND WHITECROSS. IN THE FALL OF 1968, THE RINSDALE ROAD CREW REOPENED THIS OLD ROAD WITH THEIR D-7 CAT. EXTENSIVE BULLDOZER WORK WAS ALSO DONE AROUND THE ADELAIDE MINE ENTRANCE, ALL THIS DOZER WORK SHOWS UP CLEARLY ON THE AERIAL PHOTOS AVAILABLE FROM THE USDA, YOU CAN SEE THIS DOZER WORK IN THAT AREA. OVER THE LAST FOURTEEN YEARS, WHAT THE BLM CALLS THE VEHICLE WAY, AND WHAT I DESCRIBED AS THE ADELAIDE MINE ROAD, HAS BEEN MAINTAINED BY MECHANICAL MEANS.

3

NOW, DOES THE BLM PLAN TO RESTORE THIS LAND TO ITS NATURAL CONTOUR BY MECHANICAL MEANS? WHAT WILL BE THE COST OF SUCH A PROJECT TO CREATE WILDERNESS WHERE IT DOES NOT PRESENTLY EXIST?

AS IT SITS NOW, THIS LAND IN NO WAY FITS THE

LEGAL DEFINITION OF WILDERNESS. TO CONDEMN, ACQUIRE AND RESTORE THIS PRIVATELY OWNED LAND WILL COST THE AMERICAN TAXPAYERS MILLIONS OF DOLLARS. THE ONLY REWARD THE AMERICAN PUBLIC CAN EXPECT FROM SUCH ACTION IS IMPAIRMENT OF OUR NATION'S ABILITY TO DEFEND OUR FREEDOM, DUE TO ITS LOSS OF ACCESS TO THE NATION'S DEPOSITS OF STRATEGIC AND CRITICAL MINERALS. THOSE DECISION MAKERS WITHIN THE BLM SHOULD BE REMINDED THAT THE FEDERAL GOVERNMENT IS CHARGED WITH THE DEFENSE OF THE COUNTRY, NOT ITS DESTRUCTION.

NOW, HANDIES PEAK-MINERALS, PAGE 43. THERE ARE ALSO INDICATIONS AT THIS LOCATION OF NICKEL AND COBALT MINERALIZATION. IN THE AREA OF AMERICAN BASIN, WHICH HAS HISTORICALLY MINED FOR GOLD AND SILVER, THERE ARE INDICATIONS OF SOME OCCURRENCES OF NICKEL AND COBALT MINERALS. THIS INFORMATION IS SUBSTANTIATED BY RECENT GEOCHEMICAL EVALUATION, WHICH DESCRIBES A NICKEL ANOMALY IN THE VICINITY OF HANDIES PEAK, JUST EAST OF AMERICAN BASIN.

4 NUMBER ONE. THE LACK OF IDENTIFICATION OF NICKEL AND COBALT AS CRITICAL MINERALS IS A DIRECT VIOLATION OF THE WILDERNESS STUDY POLICY AND PLANNING CRITERIA AS MANDATED BY CONGRESS.

NOW, A QUOTE FROM THE BLM'S PLANNING CRITERIA. ITEM NUMBER FOUR, ENERGY AND CRITICAL

MINERAL RESOURCE VALUES. "RECOMMENDATIONS AS TO AN AREA'S SUITABILITY OR NONSUITABILITY FOR WILDERNESS DESIGNATION WILL ALSO REFLECT A THOROUGH CONSIDERATION OF ANY IDENTIFIED OR POTENTIAL ENERGY AND CRITICAL MINERAL RESOURCE VALUES PRESENT IN THE AREA WHICH ARE CAPABLE OF MEETING DOMESTIC ENERGY AND CRITICAL MINERAL PRODUCTION NEEDS, AND THE EXTENT TO WHICH WILDERNESS MANAGEMENT OF SUCH AREAS WOULD BE IN THE PUBLIC INTEREST. THESE CRITERIA WILL BE APPLIED TO THE BLM WILDERNESS STUDY AREAS THROUGH THE BLM PLANNING PROCESS, AND EACH CRITERION WILL BE FULLY CONSIDERED AND DOCUMENTED IN DETERMINING WHETHER A WILDERNESS STUDY AREA IS MORE SUITABLE FOR WILDERNESS OR FOR OTHER USES."

CLEARLY, THE AUTHORS OF THE GUNNISON BASIN AND AMERICAN FLATS/SILVERTON WILDERNESS DRAFT ENVIRONMENTAL IMPACT STATEMENT HAVE CHOSEN TO IGNORE THE CRITERION OF ENERGY AND MINERAL -- AND CRITICAL MINERAL RESOURCE VALUES. HOW ELSE COULD THEY MENTION THE PRESENCE OF COBALT AND NICKEL MINERALS IN THE HANDIES PEAK WILDERNESS STUDY AREA WITHOUT IDENTIFYING THESE MINERALS AS CRITICAL AND STRATEGIC METALS ABSOLUTELY NECESSARY TO THE DEFENSE REQUIREMENTS OF THE UNITED STATES AND ITS ALLIES.

POINT NUMBER TWO. THE PRESENCE OR ABSENCE

OF EACH CRITICAL AND STRATEGIC MINERAL LISTED IN THE NATIONAL DEFENSE STOCKPILE INVENTORY OF STRATEGIC AND CRITICAL MATERIALS (FEDERAL EMERGENCY MANAGEMENT AGENCY: STOCKPILE REPORT TO THE CONGRESS, OCTOBER 1979-MARCH 1980) HAS TO BE IDENTIFIED IN EACH OF THE WILDERNESS STUDY AREAS BEFORE THIS DRAFT ENVIRONMENTAL IMPACT STATEMENT CAN HAVE ANY VALIDITY.

NOW, THIS IS MY SUMMARY. THE PREPARERS OF THIS DRAFT ENVIRONMENTAL IMPACT STATEMENT WITH THE APPROVAL OF THE COLORADO STATE OFFICE HAVE PUT FORTH A HIGHLY LEFT WING CONCEPT BEST DESCRIBED BY THE FOLLOWING QUOTE FROM PAGE 83, HANDIES PEAK-NO WILDERNESS ALTERNATIVE. NOW, I QUOTE.

"OUTSTANDING OPPORTUNITIES FOR SOLITUDE WOULD BE ELIMINATED THUS RESULTING IN MORE USE PRESSURE ON THE EXISTING WILDERNESS AREAS IN THE REGION. TWO OF THE HIGHEST HUMAN-ORIENTED VALUES OF THE WILDERNESS RESOURCE, AND INTANGIBLES, ARE THE PSYCHOLOGICAL AND SPIRITUAL ASPECTS OF THE WILD- LAND RESOURCE AS THEY RELATE TO FEELINGS OF SOLITUDE AND INTIMATE SPACE."

MR. SCHMIDT: MR. DUSTIN, YOU HAVE RUN OVER YOUR TIME LIMIT. WILL YOU PLEASE SUMMARIZE IN TWO SENTENCES.

MR. DUSTIN: THAT'S ALL RIGHT, I HAVE GOT ONE LAST SENTENCE.

THE MONTROSE DISTRICT OFFICE WITH THE APPROVAL OF THE COLORADO STATE OFFICE OF THE BUREAU OF LAND MANAGEMENT APPARENTLY INTEND TO SEE THIS CONCEPT PREVAIL OVER ALL OTHER VALUES, INCLUDING THOSE VALUES OF NATIONAL DEFENSE AND THE PRESERVATION OF OUR DEMOCRACY.

MR. SCHMIDT: THANK YOU, MR. DUSTIN.

OUR NEXT SPEAKER IS MR. CHAP ROWE.

MR. ROWE: MY NAME IS CHAP ROWE, AND I AM CHAIRMAN OF THE HINSDALE PLANNING COMMISSION. THAT'S A NINE MEMBER BOARD. FOUR OF THE OTHER MEMBERS I SEE IN THE ROOM AT THE PRESENT TIME. MY REMARKS ARE VERY BRIEF.

THE PLANNING COMMISSION HISTORICALLY, AND AT THE PRESENT TIME, IS UNANIMOUSLY AGAINST ANY FURTHER WILDERNESS DESIGNATION IN THIS COUNTY. PRESENTLY, 44 PERCENT OF THE COUNTY IS ALREADY DESIGNATED WILDERNESS OR PRIMITIVE AREAS, NOT STUDY AREAS. 4.6 PERCENT OF THIS COUNTY IS HELD IN PRIVATE OWNERSHIP. THE BLM CURRENTLY ADMINISTERS 110,500 ACRES IN THIS COUNTY. THEY ARE CURRENTLY ASKING FOR 54,000 ADDITIONAL ACRES IN WILDERNESS. THE LOSS OF THE LAND, AND THE USE, AND THE TAX BASE, IS A MAJOR CONCERN TO THE COUNTY PLANNERS. THE LOSS OF THE FUTURE INCOME OF THE COUNTY AS A RESULT OF THESE THINGS IS ALSO A CONCERN. THE

MINERALS AND THE DEVELOPMENT WHICH MIGHT BRING INCOME TO THIS COUNTY, WERE BASED SOLELY ON TOURISM, ON OR OFF. I DON'T WANT TO INFLUENCE ANYONE, BUT WE HAVE A FLEDGLING MINING INDUSTRY WHICH HAS BEEN FLEDGLING SINCE THE 1970'S, ONE THING OR ANOTHER GETS IN THE WAY. IN 1981-'82, MINING WAS THE NUMBER ONE INDUSTRY IN THIS COUNTY. TODAY, MINING IS THE NUMBER ONE INDUSTRY IN THIS COUNTY. THERE IS SOME LOSS IN FOUR-BY-FOUR USE IN ASSOCIATED TOURISM, HUNTING AND HORSE ASSOCIATED TOURISM.

THE PATTERN OF WILDERNESS IN THE SIERRAS AND NOW AVAILABLE IN THE COUNTY, WE HAVE A SITUATION CALLED "USER CONFLICT", THAT'S WHERE PEOPLE COME OUT HERE TO ENJOY THE WILDERNESS DON'T WANT TO GET THEIR TENNIS SHOES MUDDY, DON'T WANT TO STEP IN HORSE PLOPS. WHAT DO THEY WANT TO DO? THIS IS COLORADO, THE WEST. WHAT DO WE DO, GET RID OF THE HORSES? WE ARE ADAMANTLY AGAINST THIS. AND THE TREND, AND THE LOSS OF QUALITY DUE TO IT, IS A MAJOR CONCERN TO THE PEOPLE, AND WHAT THE BLM ADMINISTERS IS THE CASE IN POINT.

IT WAS QUITE NORMAL TO BE ABLE TO GO UP THERE AT ANY TIME IN THE SUMMER, AND HAVE A WILDERNESS EXPERIENCE. AND NOW YOU GO UP THERE AND YOU ARE CONFRONTED WITH THINGS THAT I REALLY DON'T NEED TO ENUMERATE. A LOT OF PEOPLE, DUE TO THE ADVERTISEMENT

OF THE WILDERNESS, ARE ALWAYS THERE.

PERSONALLY, AND AS A MEMBER SPEAKING FOR THE BOARD, I BELIEVE I HAVE A SEVERE QUESTION. THE GOVERNMENT IS IN AN AUSTERE TIME. YOUR ABILITY TO MANAGE ANY ADDITIONAL WILDERNESS IS HIGHLY QUESTIONABLE. THE GOVERNMENT, AND THE PRESIDENCY, IS CURRENTLY INVOLVED IN TRYING TO SET UP A PROGRAM FOR SELLING SURPLUS LANDS. WE ARE CONFRONTED WITH ANOTHER LAND GRAFT, ONE HAND OF THE GOVERNMENT TRYING TO GET RID OF SOME THAT HAVE TOO MUCH, WITH ANOTHER BRANCH OF THE GOVERNMENT TRYING TO GAIN MORE. INTERESTING PROPOSITION.

THE BURDEN OF INITIAL RESPONSIBILITY FOR WILDERNESS DESIGNATION FALLS ON THE COUNTY. WE DON'T HAVE THE MONEY OR RESOURCES FOR THESE FOUR REASONS, FIRE, MEDICAL, POLICE, TRASH. IT ALL FALLS ON THIS COUNTY, WITH ITS SMALL POPULATION, AND ITS VERY, VERY LIMITED.

THE FOREST SERVICE, I UNDERSTAND, IS CONSIDERING A PERMIT-ONLY-SYSTEM FOR EVERYONE ON THE FOREST. I MAY BE OUT OF BOUNDS SAYING THIS, BUT I BELIEVE IT'S BECAUSE OF MANAGEMENT, AND THE NUMBER OF PEOPLE ON THE LAND. I THINK THE AVERAGE HIKER WILL HAVE TO HAVE A PERMIT TO GO ON THE FOREST IN THE VERY NEAR FUTURE. I MAY STAND CORRECTED ON THAT.

CURRENTLY, THE UNPATENTED MINING CLAIMS CONTROLLED BY THE BLM IN THE FOREST OF THIS COUNTY TOTAL A LITTLE OVER FOUR CENTS AN ACRE. AN AVERAGE MINING CLAIM, UNPATENTED GROUND, WHICH WE ONLY OWN THE MINERALS TO OR THE RIGHTS TO EXPLORE FOR THE MINERALS, PLACE INTO THE COUNTY COFFERS 50 CENTS AN ACRE. WILDERNESS DESIGNATION PRECLUDES ANY FURTHER EXPLORATION OR DEVELOPMENT ON TOP OF THE LIMITED FINANCIAL RESOURCES ALREADY AVAILABLE IN THIS COUNTY. WE ARE TALKING ABOUT LOSING AN ADDITIONAL 45 CENTS AN ACRE. IT'S APPALLING.

I WILL JUST CLOSE THIS BECAUSE MY STATEMENTS ARE BRIEF -- AND I DON'T WANT TO GET PERSONAL, BECAUSE I REPRESENT A BOARD -- WITH AN ANTIDOTE THAT WILL REFERENCE BACK TO MANAGEMENT.

I OWN SOME PROPERTY BORDERING SOME OF THIS AND EVERY 16TH CORNER HAS A TWO AND A HALF INCH BRASS CAP. I RECENTLY WENT TO MONTROSE TO GET THE SURVEY NOTES. I WENT TO MONTROSE WHERE YOU HAVE THE MASTER TITLE PLAT, YOU HAVE NO SURVEY NOTES, THE SURVEY NOTES ARE IN DENVER, THE MICROFICHE IS IN GUNNISON, NO MICROFICHE READER IS IN GUNNISON. IF THAT'S THE WAY THAT THE REST OF THIS IS GOING TO BE HANDLED, I FEEL THAT THE HINSDALE PLANNING COMMISSION IS ON FIRM GROUND IN ASKING THAT NO FURTHER WILDERNESS BE DECLARED IN

THIS COUNTY.

THANK YOU FOR YOUR TIME.

MR. SCHMIDT: THANK, YOU MR. ROWE.

THE NEXT SPEAKER IS JOEL SWANK.

MR. SWANK: I'M JOEL SWANK. LADIES AND GENTLEMEN.

IN REGARDS TO THE GUNNISON BASIN AND AMERICAN FLATS/SILVERTON WILDERNESS DRAFT AND ENVIRONMENTAL STATEMENT, IT STATES SO MANY ACRES OF PRIVATE LAND. THE PRIVATE LANDS ARE ALL PATENTED MINING CLAIMS AND MILL SITES, AND THEY ALL HAD TO HAVE ENOUGH MINERAL ON THEM TO JUSTIFY A PATENT OR THEY COULD NOT GO TO PATENT. THE OWNERS OF THESE PATENTS, AND UNPATENTED MINES AND MILL SITES ARE THE ONES WHO BUILT THE ROADS AND TRAILS IN THE FIRST PLACE, IN THIS AREA, TO HAUL OUT THEIR MINED PRODUCTS TO THE MILLS AND THE SMELTERS.

OVER THE YEARS, THE COUNTY AND MINING INTERESTS IMPROVED THESE WAGON MULE TEAM ROADS INTO WHAT THEY ARE TODAY. IN 1946 WAS WHEN THE HINSDALE COUNTY COMMISSIONERS ASSIGNED ME, AS THEIR COUNTY SUPERINTENDENT OF ROADS, THE DUTY OF CONNECTING THE THEN FOUR-WHEEL DRIVE ROAD THAT ENDED AT CINNAMON PASS, THEY AUTHORIZED ME TO BUILD THE ROAD FROM CINNAMON PASS TO ANIMAS FORKS, WHICH I DID, AND THIS COMPLETED THE

LOOP FROM LAKE CITY UP TO SHERMAN, UP TO BURRO'S PARK, OVER CINNAMON PASS, DOWN INTO ANIMAS FORKS, OVER DENVER HILL, OVER ENGINEER MOUNTAIN, AND DOWN HENSON CREEK TO LAKE CITY. AND, OF COURSE, YOU CAN TRAVERSE IN REVERSE OF THIS. AND THIS TURNED OUT TO BE ONE OF THE FINEST SCENIC TRIPS WE HAVE HAD IN THIS COUNTY. I HAVE LOST MY PLACE. THE ROAD HAS NOW BEEN IMPROVED SO MUCH THAT YOU SEE TWO-WHEEL DRIVE VEHICLES WITH CAMPERS ON THEM, AND ALSO CARS, AND THAT SOMEWHAT CAUSES A TRAFFIC PROBLEM. YOU HAVE GOT A LOT OF MOTORBIKES OF ALL KINDS, YOU HAVE GOT TRAIL BIKES, AND MOTORCYCLES, AND THEY ARE ALL TRAVELERS IN THIS AREA.

SILVER CREEK AND COPPER CREEK ARE IN THE HEART OF THIS PROPOSED WILDERNESS AREA. CRIPPLE CREEK HAS A ROAD UP INTO PATENTED MINING CLAIMS THAT THERE IS ALL THESE IMPORTANT MINERALS AND ENERGY UP THERE. THERE IS ALSO A ROAD THIS SIDE OF CINNAMON PASS THAT GOES ACROSS CLEVELAND GULCH TO SCHAFER BASIN, AND INTO HORSESHOE BASIN. SILVER CREEK AND CRIPPLE CREEK ARE SO MINERALIZED THAT BUGS, AND FISH, CANNOT LIVE IN THEM. PATENTED MINES ARE ON BOTH SIDES OF SILVER CREEK, THEY ARE ALL THE WAY UP CRIPPLE CREEK. THAT OUGHT TO SPEAK FOR ITSELF BECAUSE THE PATENTED MINE HAD TO HAVE ENOUGH MINERALS TO JUSTIFY A PATENT TOO, AND IT WAS ASSIGNED A UNITED STATES PATENT.

THERE IS A ROAD UP ALPINE TO PATENTED MINING CLAIMS. THERE IS -- THERE IS A ROAD UP RED MOUNTAIN CREEK TO PATENTED MINING CLAIMS. AND IF YOU THINK ABOUT WHERE THE ALPINE GOES UP, WHERE OWL GULCH GOES UP, WHERE LEE SHELTER GOES UP, WHERE RED MOUNTAIN GOES UP, WHERE BENT CREEK GOES UP, WHERE SILVER CREEK GOES UP, WHERE CRIPPLE CREEK GOES UP, THAT ALL LEADS INTO ONE REAL FINE MINERALIZED AREA. AND UP THESE RIVERS IS ALSO REAL FINE AREAS. THEY ARE JUSTIFIED MINERALS.

THE COUNTY ALREADY HAS 40 PERCENT OF ITS LAND AREA IN WILDERNESS. USES OF ALL -- MULTIPLE USE FOR ALL OF THE PEOPLE IS FOR ALL OF THE PEOPLE. WILDERNESS IS FOR A SELECT FEW WHO CAN GO ON A PACK TRIP, AND TRAVEL UP THESE AREAS, AND ESPECIALLY GET ON HANDIES PEAK, SUNSHINE PEAK, AND RED CLOUD PEAK, AND THEY CAN YODEL INTO THE VOID, AND WE DON'T MIND THAT. BUT THAT ISN'T WHAT PAYS THE BILL AND KEEPS THIS NATION SOLID. IT WAS THE FOREIGN PEOPLE THAT STARTED THIS WILDERNESS STUFF ANYWAY, AND THEY WANT TO UNDERMINE IT SO THEY CAN DRAG US DOWN IN THE DIRT. IT'S ALSO A BUREAUCRAT HAVEN FOR THOSE TO KICK US OFF OF THE LANDS.

THANK YOU.

MR. SCHNIOT: THANK YOU, MR. SWANK.

THE NEXT SPEAKER IS JOHN SISK.

MR. SISK: THANK YOU VERY MUCH. MY NAME

IS JOHN SISK. I LIVE IN MONTROSE. AND I'M A MEMBER OF THE LOCAL CITIZEN CONSERVATION GROUP THERE IN MONTROSE CALLED THE UNCOMPAHGRE RESOURCE.

I'VE HIKED EVERY AREA THAT IS BEING STUDIED AND EVALUATED BY THE BLM IN THIS PROCESS, AND PERHAPS I WOULD LIKE TO -- WHAT I WOULD LIKE TO SAY, I THINK A VERY IMPORTANT THING IS THAT BLM REALIZE, AND THAT EVERYONE WHO IS INTERESTED IN THIS WHOLE PROCESS REALIZE, THAT WILDERNESS IS NOT A BLACK AND WHITE ISSUE. WE HAVE HEARD SOME OF THE NEGATIVE SIDES OF WILDERNESS DESIGNATION AS SOME PEOPLE SEE THEM. I WOULD LIKE TO PROVIDE SOME OTHER PROSPECTIVES THAT I THINK ARE RELEVANT TO BLM'S DECISION.

I THINK THAT WILDERNESS VALUES AND NATURAL VALUES CAN VERY OFTENTIMES BE ECONOMIC VALUES TO A COMMUNITY. WATERSHED QUALITY IS A GOOD EXAMPLE. ANY MUNICIPALITY THAT HAS HAD TO DEAL WITH A WATERSHED POLLUTER, BY ABANDONED MINE TAILINGS, BY VARIOUS OTHER THINGS THAT CAN CAUSE PROBLEMS, KNOWS THAT IT'S EXPENSE, IT'S DIFFICULT AND IT'S A HEALTH HAZARD. WILDERNESS CAN PROTECT MUNICIPAL WATERSHEDS, HIGH ELEVATION TRIBUTARY STREAMS THAT WILL MAINTAIN THE QUALITY OF DOWNSTREAM WATER.

WILDLIFE AND FISH IS A RESOURCE THAT WILDERNESS DOES A GOOD JOB OF PROVIDING, IN THIS CASE,

SUMMER HABITAT FOR; ELK, FOR EXAMPLE, BEING VALUABLE.

THE COLORADO DIVISION OF WILDLIFE ESTIMATED LAST YEAR THAT HUNTING AND FISHING GENERATES OVER 500 MILLION DOLLARS FOR COLORADO'S ECONOMY ANNUALLY IN THIS STATE. A LOT OF SMALL TOWNS, MONTROSE BEING ONE, LAKE CITY BEING ANOTHER, BENEFITS IMMENSELY FROM THE INFLUX OF HUNTERS IN THE FALL.

SEVERAL NOTED ECONOMISTS IN THIS COUNTRY, WORKING WITH A GROUP CALLED "RESOURCES FOR THE FUTURE", THEIR NAMES ARE MARION CLAWSON, AND WILLIAM HYDE, HAVE COME OUT WITH SOME INTERESTING STUDIES, RECENTLY, SHOWING THAT BY NO MEANS, IN EVERY CASE, BUT IN A SURPRISING NUMBER OF CASES, WILDERNESS IS ACTUALLY ONE OF THE MOST EFFICIENT USES OF THE LAND, WHERE THE COSTS OF FEDERAL ADMINISTRATION FOR MORE DEVELOPED USE IS HIGHER THAN THAT DEVELOPED USE CAN PROVIDE IN REVENUES. THE WILDERNESS MEASUREMENT OPTION IS ECONOMICALLY EFFICIENT.

I WOULD ALSO LIKE TO READ SOMETHING THAT A FRIEND OF MINE WHO LIVES IN SAN JUAN, IDAHO STATED RECENTLY IN A FEDERAL HEARING ON OIL AND GAS LEASE WILDERNESS. HE SAID, "BESIDES RANCHING, WILDERNESS RELATED TOURISM AND RECREATION IS THE ONLY SOLID ONE. COBALT MINING IS SHUT DOWN. AND THE TIMBER INDUSTRY IS SHUT DOWN DUE TO A POOR MARKET BECAUSE OF HIGH INTEREST

RATES. ONLY TOURISM AND RECREATION IS GROWING. BEFORE WE HAD THE WILDERNESS DESIGNATION IN THE RIVER-OF-NO-RETURN, THERE WAS A LOT OF RESISTANCE AMONG THE BUSINESS COMMUNITY THAT THE LOCKUP OF THE WILDERNESS DESIGNATION WOULD ADVERSELY AFFECT THE ECONOMY." HE THEN GOES ON, THIS IS MY WORDS HERE, TOO, "THE LOCAL CHAMBER OF COMMERCE PRESIDENT, SEVERAL YEARS AFTER THE WILDERNESS AREA WAS DESIGNATED, WHO SAID, 'I'M EXCITED ABOUT THE TOURIST INDUSTRY AND THE IMPACT IT CAN HAVE ON THE SALMON AREA. NOWHERE CAN THIS TYPE OF BEAUTY THE SALMON AREA OFFERS BE FOUND. IT'S A GOOD BOOM IMPACT ON THIS AREA, AND THE SCHOOLS, AND SUCH.'"

AND THEN BROOKS MONTGOMERY GOES ON TO STATE, "THE THEME BEING USED BY THE SALMON CHAMBER ARE, 'WHITE WATER CAPITOL OF THE WORLD, GATEWAY TO IDAHO'S WILDERNESS.'"

I READ THAT AS AN EXAMPLE AS TO HOW YOU CAN TURN SOME OF THESE THINGS TO AN ADVANTAGE, AS WELL AS PERHAPS ERRONEOUSLY SEEING THEM AS A LIABILITY.

ANOTHER POINT IS THAT I THINK THAT IF WE CAN'T -- I THINK THAT THE WILDERNESS IS VERY COMPATIBLE TO MULTIPLE USE AND, IN FACT, INVOLVES A LOT OF MUSTIPLE USES. WATERSHED PROTECTION IS ONE OF THEM, WILDLIFE AND FISH I MENTIONED, RECREATION. IT DOESN'T -- ALTHOUGH WILDERNESS DOESN'T ALLOW MOTORBIKES, AND SUCH,

IT DOES PROVIDE FOR MANY FORMS OF RECREATION. GRAZING IS ALLOWED. RECENT CONGRESSIONAL LANGUAGE NOW ALLOWS STOCKMEN TO HAVE VEHICLE ACCESS OCCASIONALLY TO MAINTAIN AND IMPROVE RANGE STRUCTURES, RANGE MANAGEMENT STRUCTURES. VALID MINERAL RIGHTS ARE HONORED.

AND THERE IS STILL -- THIS IS UNDER DEBATE IN CONGRESS, BUT AT PRESENT THERE IS STILL SOME TIME LEFT FOR THE FILING OF ADDITIONAL CLAIMS AND APPLICATIONS FOR MINERAL LEASES.

I THINK THAT THE MAJORITY OF THE MULTIPLE USE VALUES THAT WE ALL PLACE IN HIGH ESTEEM ARE POSSIBLE IN WILDERNESS, AND THAT WILDERNESS FITS IN A GOOD SPECTRUM OF MULTIPLE USE ON PUBLIC LANDS.

SOME SPECIFIC RECOMMENDATIONS I HAVE TO THE BUREAU OF LAND MANAGEMENT CONCERNING THEIR DRAFT WILDERNESS RECOMMENDATIONS. I BELIEVE THAT THEIR DECISION WITH REGARD TO THE AMERICAN FLATS AREA, ADJACENT TO THE BIG BLUE WILDERNESS, IS A GOOD ONE. WHILE IT'S NOT AS LARGE AS IT COULD HAVE BEEN, IT DOES COMPLIMENT AND ROUNDS OUT GEOGRAPHICALLY THE WILDERNESS EXISTING AREAS.

I THINK IT IS TRUE, THAT WEMINUCHE CONTIGUOUS AND WHITEHEAD GULCH, IN THE BOUNDARIES THAT BLM HAS PROPOSED, THEY ARE NOT THE MAXIMUM BOUNDARIES, THEY ARE THE AREAS THAT ARE SUITABLE FOR WILDERNESS

THAT HAVE BEEN LEFT OUT, BUT THE BOUNDARIES ARE REASONABLE. THE RAMDIES PEAK AREA, I CAN PERCEIVE, WOULD BE, WITH THE PROPOSED BOUNDARIES, A WILDERNESS MANAGEMENT PROBLEM. IF SLOAN LAKE, IN THE EXISTING CHERRY STEM, IS LEFT THE WAY IT IS, I THINK IF THAT AREA GOES WILDERNESS THAT IT WOULD BE -- BEHOOVE THE BUREAU OF LAND MANAGEMENT TO PULL THAT BOUNDARY BACK ABOUT A MILE AND A HALF DOWN THE WAY THAT IT HAS BEEN CHERRY STEMMED THERE IN ORDER TO MAKE THE RECREATIONAL USE OF SLOAN LAKE MORE MANAGEABLE SO THAT THAT LAKE DOES NOT GET ABUSED BY OVERUSE.

ALSO, I THINK THAT THE BUREAU OF LAND MANAGEMENT SHOULD EXPLORE WITH THE FOREST SERVICE, WITH THE GUNNISON FOREST, AND THE RIO GRANDE FOREST, THE POSSIBILITY OF SOME SORT OF COOPERATIVE MANAGEMENT OF LAND ADJACENT TO THE SOUTHERN PART OF THE RANDIES PEAK WILDERNESS STUDY AREA WHICH IS DROPPED OUT. THIS IS A LOW CONFLICT AREA, UNLIKE SOME OF THE WILDERNESS STUDIES AREAS AS FAR AS MINERALS GO, AND IF THERE WAS SOME SORT OF A FOREST SERVICE COOPERATION THERE, I THINK IT MIGHT BE POSSIBLE FOR A WILDERNESS RECOMMENDATION TO STICK ON THAT SOUTHERN PART THAT, ADMITTEDLY, AS IT APPEARS ON THE MAP, DOES HAVE A LAND OWNERSHIP PROBLEM AS FAR AS MANAGEABILITY.

THE RED CLOUD PEAK WILDERNESS STUDY AREA,

THAT IS PROBABLY THE GREATEST DISAPPOINTMENT TO ME, THE BOUNDARIES THAT BLM HAS PROPOSED, BECAUSE THE BOUNDARIES BLM HAS PROPOSED ARE ESSENTIALLY DRAWN AT TIMBERLINE, AND INCLUDES EVERYTHING ABOVE TIMBERLINE, AND EXCLUDES EVERYTHING BELOW TIMBERLINE. FROM A WILDERNESS POINT OF VIEW, SOME OF THE MOST BEAUTIFUL AND VALUABLE LANDS IN THERE ARE THE ALPINE GULCH AN ALPINE DRAINAGE. AND AS I UNDERSTAND THE RATIONALE ON BLM'S PART, IT ALLOWS THE POSSIBILITY OF AN ALUNITE MINE ON RED MOUNTAIN.

MY RECOMMENDATION AND THE RECOMMENDATION OF THE UNCOMPAHGRE RESOURCE COUNCIL OF MONTROSE IS THAT BLM EXPLORE A COMPROMISE BOUNDARY THAT WOULD INCLUDE ALPINE GULCH DRAINAGE, AND WOULD PROVIDE POSSIBLE ACCESS TO RED MOUNTAIN, TO THE ALUNITE DEPOSIT FROM THE EAST SIDE, ONE OF THE TWO EXISTING ROADS THERE, AND PURSUE A PROPOSAL THAT WILL PROVIDE SOME, I THINK, MORE HOLISTIC PRESERVATION OF THAT WILDERNESS STUDY AREA. I'M NOT FORECLOSING THE LONG TERM OPTION OF DEVELOPING THE MINERAL RESOURCES THERE.

THE FINAL COMMENT I WOULD LIKE TO MAKE IS THAT I WAS IN A MEETING AT PAGOSA SPRINGS SEVERAL YEARS AGO, AND A GENTLEMAN POINTED OUT, AS HE PUT IT, THAT WILDERNESS CAN BE SEEN AS A THREAT OR IT CAN BE SEEN AS, "MONEY IN THE BANK." WHAT HE MEANT BY THAT IS THAT

IF A LAND MANAGEMENT AGENCY IS GOING TO ERROR IN THEIR RECOMMENDATION, THEY SHOULD ERROR IN A WAY THAT LEAVES THE MOST FUTURE OPTIONS OPEN. IF YOU ERROR IN A WAY THAT ALLOWS A WILDERNESS AREA TO BE NEEDLESSLY DEVELOPED, YOU HAVE LOST THE WILDERNESS, AND MAY HAVE LOST OTHER RESOURCES, LIKE WATER QUALITY AND WILDLIFE HABITAT AS WELL. WHEREAS, IF YOU ERROR IN THE DIRECTION OF PROTECTING TOO MUCH OF THE LAND, THE RESOURCES THAT ARE THERE ARE STILL THERE, AND THE WILDNESS IS STILL THERE, AND THE DECISION CAN BE CHANGED IN THE FUTURE, IF THAT IS PROVEN TO BE AN ERRONEOUS MOVE. CONGRESS IS NOT GOING TO BE BOUND FROM ONE YEAR TO THE NEXT, AND WE ARE SEEING THAT VERY CLEARLY TODAY IN A LOT OF THINGS THAT THEY ARE DOING.

SO I THINK WHEN IT'S A FUZZY ISSUE, IT'S BEST TO ERR IN THE DIRECTION THAT WOULD LEAVE THE MOST OPTIONS OPEN. AND I DON'T THINK THAT WILDERNESS RESOURCES SHOULD BE SACRIFICED UNLESS THE OTHER RESOURCES ARE PROVEN TO BE A CRITICAL AND IMMEDIATE NEED.

THANK YOU VERY MUCH.

MR. SCHMIDT: THANK YOU, MR. SISK.

OUR NEXT SPEAKER IS NANCY KELSO.

MRS. KELSO: I'M NANCY KELSO. AND I LIVE IN MONTROSE.

AND AFTER LOOKING AT THE CIS, I JUST WOULD LIKE TO SAY, I WOULD LIKE TO COMMEND THE BLM FOR INCLUDING AMERICAN FLATS.

AND ABOUT THE RED CLOUD PEAK AREA, AND HANDIES PEAK, I HAVE BACKPACKED IN THAT AREA, AND I FEEL THAT MORE WILDERNESS SHOULD BE DESIGNATED THERE.

ALPINE GULCH AND OWL GULCH, I FEEL, SHOULD BE DESIGNATED AS WILDERNESS. AND IN THIS HANDIES PEAK AREA, I THINK THE ROAD TO SLOAN LAKE SHOULD BE CLOSED OFF THERE.

MR. SCHMIDT: THANK YOU, MRS. KELSO.

THE NEXT SPEAKER IS PERK VICKERS.

MR. VICKERS: EVENING FOLKS. I'M PERK VICKERS, AND I APPRECIATE THE OPPORTUNITY TO APPEAR BEFORE THIS COMMITTEE AND MAKE A BRIEF STATEMENT. AND MY STATEMENT WILL BE VERY BRIEF.

I HAVE ALWAYS FELT THAT WE NEEDED SOME WILDERNESS IN THE AREA, BUT I NEVER FELT WE NEEDED TO PUT A WHOLE COUNTY IN THE WILDERNESS. BUT WHEN YOU GET TO TALKING ABOUT THE RED CLOUD PEAK AREA, AND THE HANDIES AREA, I HAVE TO NOTE AN EXCEPTION, BECAUSE MY FAMILY AND ASSOCIATES HAVE EXPENDED PROBABLY A MILLION DOLLARS IN AMERICAN BASIN ALONE, IN THE LAST TEN YEARS, DEVELOPING MINERAL. AND ONCE THAT GOES INTO WILDERNESS, THAT'S THE END OF OUR MINERAL DEVELOPMENT.

AND IN THIS UNITED STATES OF AMERICA, THEY ARE GOING TO BE WANTING THIS MINERAL. IT'S JUST TEMPORARY, NOW THAT WE HAVE GOT A SLOWDOWN IN THE MINING. IT WILL HAPPEN. AND THAT COUNTRY IS WILDERNESS NOW, AND ALWAYS IS GOING TO BE WILDERNESS. ALL THE MINING IN THE WORLD ISN'T GOING TO CHANGE THAT. LET US MINE AND HAVE WILDERNESS TOO, WE CAN WORK THEM TOGETHER.

THE BUREAU OF LAND MANAGEMENT HAS FULL JURISDICTION OVER THOSE LANDS, WHAT MORE DO THEY WANT? YOU PUT IT IN A WILDERNESS, AND IT'S DEADLOCKED, NOBODY CAN DEVELOP ANYTHING. IF YOU FIND A GOLD MINE, YOU CAN'T PRODUCE IT. LET'S LEAVE IT LIKE IT IS. GOD KNOWS THE BLM HAS GOT ALL THE JURISDICTION THEY NEED. MY GOODNESS, I THINK IT'S RIDICULOUS TO TRY TO PUT THAT LAND INTO WILDERNESS.

THAT'S ABOUT ALL I HAVE GOT TO SAY. BUT WHERE YOU TALK ABOUT MISCARRAGE OF JUSTICE, THAT IS ONE.

THE UNITED STATES GOVERNMENT THEMSELVES, THE UNITED STATES BUREAU OF MINES, AND THE U.S. GEOLOGICAL SURVEY, DOWN THROUGH THE YEARS, HAVE TOLD US THE BIGGEST UNDEVELOPED POTENTIAL IN THE ENTIRE WEST IS RIGHT IN OUR IMMEDIATE AREA. WE HAVE IT, LET US PRODUCE IT. BUT IF YOU PUT IN A WILDERNESS, THEN IT'S DEAD.

THANK YOU VERY MUCH.

MR. SCHMIDT: THANK YOU VERY MUCH, MR. VICKERS.

THE NEXT SPEAKER IS JOHN PARKER.

MR. PARKER: MY NAME IS JOHN PARKER.

THE FIRST THING I WOULD LIKE TO SAY IS THAT I'M NOT AGAINST MINING. I OWN SOME SHARES IN THE ONLY OPERATING MINE THAT'S GOING IN LAKE CITY AT THIS POINT. AND I ALSO WOULD ADMIT THAT I DON'T KNOW ANYWHERE NEAR AS MUCH ABOUT IT AS PERK, AND JOEL, AND OTHERS THAT ARE HERE. HOWEVER, I DO HAVE A FEW OTHER POINTS THAT I THINK SHOULD BE CONSIDERED.

IF WILDERNESS EXPLORATION CAN TAKE PLACE, GRAZING CAN TAKE PLACE -- AND I OWN A RANCH DOWN THE ROAD HERE THAT HAS ONE ROAD THAT IS OPEN TO PRIVATE -- I MEAN TO PUBLIC USE. THE JEEPS AND MOTORBIKES DRIVE ALL OVER MY RANCH, WHERE THERE IS NO ROADS, RUN OVER TREES, THROW OUT THE TRASH, BEER CANS, EVERYTHING ELSE. I HAVE TO CONSTANTLY PICK IT UP TO MAINTAIN IT. THEREFORE, I FEEL STRONGLY THAT CERTAIN OF OUR AREAS NEED TO BE PROTECTED. UNFORTUNATELY, FOR THE PEOPLE THAT LIVE HERE, AND ALSO THOSE THAT COME TO VISIT US FOR THE SAME REASON, THEY ARE DESTROYING IT.

I FEEL THAT THE BLM, THROUGH THEIR PREFERRED ALTERNATIVES IN THIS PROPOSAL, HAVE WORKED HARD TO COME

UP WITH COMPROMISES BETWEEN THE VALUES OF THE MINERALS THAT ARE THERE AND THE VALUES OF THE WILDERNESS THAT ARE ALSO THERE.

ONE CASE THAT IS IN POINT IS I KNOW WE ARE ALL OPPOSED TO RED MOUNTAIN HERE BEING IN WILDERNESS, AND IT IS PREFERRED THAT YOU LEAVE IT OUT.

ANYBODY WHO LIVES IN RIFLE, AS I MY BROTHER DOES, OR CRESTED BUTTE, OR OTHER PLACES, KNOWS OF THE PROBLEMS WITH MINING IN ITS UP AND DOWN CAREER AS FAR AS ECONOMICS, AND ALSO ITS EFFECTS ON THE BUSINESS AND WATER SYSTEMS, SO ON AND SO FORTH, OF THIS UP AND DOWN OF MINING, WHICH HAS BEEN HISTORICALLY PART OF MINING.

LAKE CITY IS IN A POSITION, A UNIQUE POSITION, PRIMARILY, IN COLORADO. WE ARE, FOR BETTER OR FOR WORSE, IN SOME PEOPLE'S MINDS, PRACTICALLY SURROUNDED BY WILDERNESS AREAS, WITH POWDERHORN, AND BIG BLUE, RED CLOUD, HANDIES, AND AMERICAN FLATS AND OTHERS.

WHERE IS OUR BREAD BUTTERED NOW? OUR BREAD IS BUTTERED FROM TOURISM. 95 PERCENT, AT LEAST, OF THE PEOPLE LIVING IN THIS TOWN, THEIR LIVELIHOOD IS DEPENDENT ON TOURISM. POWDERHORN -- CLUB 20 CAME OUT WITH A STUDY IN THEIR LAST QUARTERLY REPORT, AND ESTIMATED THE INCOME IN HINSDALE COUNTY FROM TOURISM IN 1980 WAS 7 MILLION DOLLARS. HOW MUCH DID WE GET FROM

MINING? I'M NOT SURE, BUT IT WAS NOWHERE NEAR THAT.

ON A PROJECTED GROWTH IN TOURISM OF EIGHT PERCENT PER YEAR, WHICH I THINK IS VERY CONSERVATIVE, THAT WOULD BE AN INCREASE OF A HALF A MILLION DOLLARS PER YEAR TO THE ECONOMY, TO HINSDALE COUNTY, AND THAT IS A GEOMETRIC PROGRESSION, SO IT WOULD GO FASTER THAN THAT.

IF WE PROPERLY USE THE NATURAL RESOURCES OF THE WILDERNESS AREAS, IT WILL, OVER THE YEARS, BRING MUCH MORE CONTINUOUS AND CONSTANT ECONOMIC GROWTH THAN MINERALS.

THANK YOU.

MR. SCHMIDT: THANK YOU MR. PARKER.

OUR NEXT SPEAKER IS NORMA SWANSON.

MRS. SWANSON: AS CHAIRMAN OF THE HINSDALE COUNTY WILDERNESS ALLIANCE, I WISH TO THANK YOU FOR THIS OPPORTUNITY TO GIVE TESTIMONY.

IN MOST OF THE MEETINGS WITH THE BLM, IT HAS BECOME APPARENT THAT THE LAW REQUIRES THAT THE HEARINGS BE HELD, BUT OFTENTIMES DOESN'T REQUIRE ANYBODY TO LISTEN. THE FRUSTRATION FELT LOCALLY IS BASED UPON THE FACT THAT NEARLY 96 PERCENT OF THE COUNTY IS GOVERNMENTALLY OWNED AND CONTROLLED, AND THAT 44 PERCENT OF THAT IS DESIGNATED AS WILDERNESS OR PRIMITIVE RIGHT NOW BY ACTS OF CONGRESS. ENOUGH IS

ENOUGH.

THIS DRAFT EIS STATEMENT APPEARS TO BE RECREATIONALLY ORIENTED AT BEST, BUT FURTHER EXAMINATION SHOWS THAT THE COLORADO MINERAL BELT WAS MAPPED IN THE EARLY YEARS. THE BLM'S WILDERNESS STUDY AREAS ARE NOW COVERING THAT BELT.

AS A COUNTY PLANNING BOARD MEMBER, I AM REQUIRED TO ACCEPT AND ACKNOWLEDGE AND CONSIDER ANY GEOLOGIC HAZARDS WHEN MAKING LAND USE DECISIONS. THIS KNOWLEDGE APPARENTLY WASN'T TAKEN INTO CONSIDERATION OR WE WOULDN'T HAVE GOTTEN TO THE POINT OF A DRAFT EIS. IN AN ATTEMPT TO CREATE MORE WILDERNESS, THE DRAFT EIS MISLEADS THE PUBLIC INTO BELIEVING THAT THE STUDY IS A COMPROMISE BETWEEN CONFLICTS, WHEN IN FACT THE CONFLICTS WERE THERE AND PRESENT. IT'S A WAY OF DIVIDING THE PUBLIC, TO FIGHT AMONG THEMSELVES, TO SPEND A LOT OF TIME IN DIVISIONS WITH SPECIAL INTEREST GROUPS, AND SPEND A LOT OF MONEY AND A LOT OF ENERGY TO DEFEND THEIR OWN STAND, WHEN ALL OF US ARE LIVING TOGETHER RIGHT NOW. THE DRAFT EIS BASES ITS CONSIDERATIONS ON ECONOMIC CONSIDERATIONS AND ON INCOMPLETE STUDIES. THE COST TO THE COUNTY IN LOSS OF TAXES VERSUS THE LOSS OF RECREATIONAL VISITOR DAYS, OR THEIR INCREASES, IS WHAT IT WAS WEDGED AGAINST, AND THE 4.6 PERCENT PER ACRE OF PILT MONIES NOW IN

CONSIDERATION. THERE IS NO CONSIDERATION TO THE LOSS IN EXPLORATION MONIES THAT'S PRESENTLY HERE, THE LOSS IN FUTURE MINERAL DEVELOPMENT ON A LOCAL, STATE AND EVEN NATIONAL LEVEL.

IT IS AS IF THIS DRAFT EIS IGNORES THE CONGRESSIONAL MANDATE TO CONSIDER AND SPELL OUT THE CRITICAL AND STRATEGIC MINERALS TO THE NATION'S NATIONAL INTERESTS.

5 I HAVE A QUESTION. ARE THE RECREATIONAL VISITOR DAYS CALCULATED AT TWELVE HOURS A DAY CONSIDERED TWICE IF YOU ARE ASKING FOR OVERNIGHT VISITORS? SOMETIMES THE STATISTICS CAN GET MANIPULATED. AND IT DOESN'T APPEAR THAT THE COSTS ARE TAKEN INTO ACCOUNT IN AN UNBIASED MANNER.

THERE IS NO STUDY THAT HAS BEEN DONE, THAT I'M AWARE OF, THAT CONSIDERS THE DAMAGES DONE BY SOME OF THE VISITORS, DAMAGE TO THE LAND, TRASH IN AREAS, FIRES, ET CETERA.

NOW, LET'S SPEAK TO THE GAMEMANSHIP. PRIVATE LAND HOLDINGS ARE ALWAYS REFERRED TO IN DRAFT EIS STATEMENTS. THE BLM CONSIDERS MAKING TRADES VITALLY IMPORTANT IF YOU ARE TO PRESERVE AN AREA. YET THE GAMEMANSHIP COMES IN HERE, WHERE THE BLM CUTS OFF THE ACCESS, MAKES PRACTICAL USES IMPOSSIBLE AND LOWERS THE LAND VALUES SO THAT OVER A FIVE YEAR PERIOD, WHEN

6

YOU CAN EFFECT A TRADE, THE PRIVATE LANDOWNER COMES OUT ON THE SHORT END OF THE STICK.

THE PRIVATE LANDS SHOWN ON THE MAPS ARE OFF BASE BY A HALF MILE TO A QUARTER OF A MILE. I'M NOT CONCERNED ABOUT IT IN TERMS OF CONTENT AT THE PRESENT TIME, BUT LATER, WHEN A PERSON IS TRYING TO DEFEND HIS PRIVATE LAND HOLDINGS, THE STATEMENT WILL BE MADE, "WELL, THIS WAS ACCEPTED AS AN ACCURATE MAP", AND HE MAY HAVE TO TRADE FOR LAND HE DOESN'T EVEN OWN. THIS HAS HAPPENED ON THE FOREST SERVICE LEVEL WHEN THERE HAS BEEN UNCORRECTED SURVEYS OR UNSURVEYED AREAS; I WOULD SUGGEST THAT BE CORRECTED.

IT WAS SAD TO SEE THAT BUD CURTIS'S NAME WAS NOT MENTIONED ON THE DRAFT EIS STATEMENT. WE HAVE SEEN HIM FROM MEETING TO MEETING, AND HE'S BEEN A REAL PART OF ORCHESTRATING THIS ENTIRE STUDY.

NOW, THE SOLICITOR GENERAL'S OPINION REGARDING ANY ACCESS TO PRIVATE LANDS SEEMS TO HAVE BEEN TOSSED IN THE TRASH. WE PAY, AND THE OWNERS SEEM TO PAY, AND THE SYSTEM PERPETUATES ITSELF. EACH OWNER IN THIS AREA IS IN TRESPASS IF HE USES THE ROADS TO HIS PROPERTY OR INSTALLS A ROAD TO HIS PROPERTY. ONLY THE COURT WILL ARBITRATE THIS BLM POLICY.

REQUESTS TO CLEAR AN OLD ROAD ARE IN THE USUAL BUREAUCRATIC STALL RIGHT NOW, EVEN THOUGH THE

ROAD IMPROVEMENT PLAN WOULD POSSIBLY PREVENT FURTHER EROSION TO THE SURFACE AND POSSIBLY PROVIDE A BETTER AVENUE FOR EVERYBODY CONCERNED. EVEN THOUGH I HOLD A COPY OF THE PRELIMINARY STUDY DONE BY THE BLM FROM THE DENVER DISTRICT OFFICE, WHEN I REQUESTED THIS REPORT THE WEEK OF ITS SIGNATURE OF ACCEPTANCE BY THE WAY OF THE FREEDOM OF INFORMATION REQUEST, THE BLM IN DENVER DENIED ITS EXISTENCE. I COMPLIMENT THE MONTROSE OFFICE FOR AT LEAST DIGGING OUT THE REPORT AND SENDING IT TO ME A FEW MONTHS LATER.

I FIND IT IRONIC THAT LARSON CREEK, AND DILL HARE GULCH ARE AREAS WE KNOW, IN FACT, THAT THEY HAVE LESS MINERAL POTENTIAL AND TIMBER POTENTIAL, NOT AS MUCH GRAZING IS AFFECTED IN THE AREA, YET THEY WERE LARGELY DROPPED FROM RECOMMENDATION IN THE WILDERNESS STUDY.

THIS PRELIMINARY MINERALS STUDY THAT WAS DONE TO KIND OF KICK OFF AN EVALUATION PROCESS, STATED IN ITS SUMMARY THAT THEY RECOMMENDED NO WILDERNESS AREA BE DECLARED IN THE RED CLOUD PEAK AREA. I SPOKE WITH THE AUTHOR, AND HE SAID IT WAS BASICALLY A COMPROMISED REPORT, AND HE WAS TOLD TO PLAY LIGHT ON THE HANDIES PEAK AND AMERICAN FLATS AREA, AND NOT TO DISCUSS THAT, THE MINERAL POTENTIAL THERE.

MINERAL INTERESTS ARE REQUIRED TO PAY FOR

IMPACT MONIES, RECLAMATION MONIES, PLUS GENERATE MONIES TO THE LOCAL AREA. GRANTED, THERE IS AN INFLUX, AND THERE IS A DECLINE, DEPENDING ON ECONOMICS, BUT THE DAMAGE DONE BY THE GENERAL PUBLIC HAS NOT BEEN REALLY FELT.

THE CHARACTER OF OUR TOURISM, WERE THIS TO BE DESIGNATED WILDERNESS, MORE AND MORE, WILL CHANGE. I FEEL THAT THE FOUR-WHEEL DRIVERS, THE OLDER PEOPLE, THE HANDICAPPED PEOPLE WILL NO LONGER COME UP HERE AND WISH TO RETIRE IF THEY ARE LIMITED TO CERTAIN AVENUES IN AND OUT OF TOWN.

IN MANY INSTANCES, THE WATER QUALITY HAS ALREADY BEEN TAINTED, NOT BY MINING ACTIVITY BUT BY THE MINERALS IN THE GROUND THEMSELVES. I AGREE WE SHOULD HAVE GOOD WATER QUALITY, BUT WE STARTED OUT WITH MINERALS, I DIDN'T PLACE THEM THERE, NOBODY IN THIS ROOM PLACED THEM THERE, THEY ARE THERE, AND THERE IS AN EFFECT ON OUR WATER QUALITY IN A CERTAIN AREA.

MY BIGGEST CONCERN IS THAT UPON WILDERNESS DESIGNATION, THAT ALL THESE BENEFITS WE HAVE RIGHT NOW, SUCH AS GRAZING, SUCH AS HUNTING, SUCH AS FISHERIES, COMMERCIAL GUIDE SERVICES, AND SO ON, WILL BE ELIMINATED AT USER CONFLICT SESSIONS SUCH AS THE HORSES REMOVED FROM DESIGNATED TRAILS, AND SO ON.

WE ARE AGAINST ANY FURTHER DESIGNATION AT

THE PRESENT TIME, IN THIS AREA, FOR WILDERNESS.

LEGISLATION. I HOPE THAT SOMEONE WILL LISTEN WHEN THIS COMES TO THE LEGISLATION POINT, AND CAN UNDERSTAND ALL OF THE BIASES FORMED BY THESE CONFLICTS, AND BY PEOPLE BEING TOSSED ONE AGAINST ANOTHER, IN ORDER TO COME UP WITH SOME KIND OF BALANCE.

THANK YOU.

MR. SCHMIDT: THANK YOU, MRS. SWANSON.

I'D LIKE TO AT THIS POINT GO OFF THE RECORD FOR A FEW MINUTES AND SEE IF ANY OF YOU PEOPLE HAVE ANY QUESTIONS, AND TO GIVE THE COURT REPORTER A BREAK. I KNOW WE HAVE ONE MORE SPEAKER WHO HAS SIGNED UP. ARE THERE ANY QUESTIONS FROM THE FLOOR?

OFF THE RECORD.

(A RECESS WAS HAD.)

MR. SCHMIDT: WE MIGHT JUST AS WELL GO BACK ON THE RECORD AND FINISH THIS.

THE LAST SPEAKER IS BRUCE VIERHELLER.

MR. VIERHELLER: MY NAME IS BRUCE VIERHELLER. AND I OWN SOME PROPERTY IN CAPITOL CITY. AND I THINK THE COMPROMISES THAT THE BLM HAS MADE, THAT ARE PROPOSED IN THIS PROPOSED ENVIRONMENTAL DRAFT, SEEM TO BE PRETTY ADEQUATE WITH WE DO THE RED CLOUD AND THE HANDIES PEAK AND THE AMERICAN FLATS WILDERNESS AREAS.

I THINK THE COMPROMISE BETWEEN SOME OF THE

MINING INTERESTS AND SOME OF THE WILDERNESS INTERESTS IN THE AREAS WE ARE TALKING ABOUT IS OKAY. AND I WOULD LIKE TO SEE THAT THE QUALITY OF LIFE IN THE MOUNTAINS, WHICH I THINK MOST OF US ARE HERE FOR, REMAINS VERY HIGH BECAUSE THAT SEEMS REAL IMPORTANT TO ALL OF US.

MR. SCHMIDT: THANK YOU, MR. VIERHELLER.

IS THERE ANYONE ELSE WHO WISHES TO MAKE A STATEMENT?

HEARING NO ONE, AND SEEING NO ONE, WE WILL RECESS THIS HEARING UNTIL TOMORROW NIGHT IN SILVERTON.

I WANT TO THANK EVERYONE FOR ATTENDING. WE APPRECIATE YOUR COMMENTS AND WELL GIVE THEM CONSIDERATION AS WE PROCESS THIS ENVIRONMENTAL IMPACT STATEMENT INTO A FINAL STATEMENT AND PROCEED THROUGH THE DECISION MAKING PROCESS IN THIS MATTER.

(THE HEARING CONCLUDED AT 8:13 P.M.)

* * * * *

REPORTER'S CERTIFICATE

THE ABOVE AND FOREGOING IS A TRUE AND COMPLETE TRANSCRIPTION OF MY STENOTYPE NOTES TAKEN AT THE TIME AND PLACE ABOVE SET FORTH.

DATED AT MONTROSE, COLORADO, JUNE 4, 1982.

Jerry B. Rigby

Response to Lake City Public Hearing Comments

1 Inaccuracies on the map relating to the exact location of private lands result from the lack of cadastral survey of these areas. We have attempted to more accurately portray the location of private lands within the WSAs themselves on the final map. The state mineral tracts were inadvertently omitted from this map, but have been included on the final.

2 The text has been corrected to identify the existence of, and more accurately define, critical minerals.

3 A road was identified near the townsite of Sherman which provides access to patented lands. This road and private land has been recommended non-suitable for wilderness designation in the proposed action. There are some other existing ways within the WSA, but these have not been maintained to ensure relatively regular and continuous use.

4 See response "2" above.

5 Yes; a Recreational Visitor Day is one individual for 12 hours.

6 See response "1" above.

ORIGINAL

BLM HEARING
on
GUNNISON BASIN and
THE AMERICAN FLATS-
SILVERTON WILDERNESS

PLACE: Town Hall
Silverton, Colorado

DATE: May 11, 1982

TIME: 7:15 p.m.

HEARING OFFICER: Bob Schmidt

PANEL MEMBERS: Terry Reed
Area Manager
Gunnison Basin Resource Area
Montrose District
BLM, Montrose, Colorado

Lance Nimmo
Team Leader
Planning and Environmental Coordination Staff
BLM, Montrose, Colorado

Jon Sering
Wilderness Coordinator, Division of
Resources, Montrose District
BLM, Montrose, Colorado

(WHEREUPON the following proceedings were had and held of record.)

HEARING OFFICER: If you will let me have your attention, please, we will now reconvene the hearings on the Gunnison and American Flats/Silverton Wilderness Amendment Environmental Impact Statement.

My name is Bob Schmidt. I am the Associate District Manager of the Bureau of Land Management. I have been asked to preside over this hearing.

A hearing panel has been designated to receive your comments. The members of the panel are: On my left, Lance Nimmo, Team Leader, Planning and Environmental Coordination Staff, Montrose District, Bureau of Land Mansgement, Montrose, Colorado.

In the center, Terry Reed, Ares Manager, Gunnison Basin Resource Area, Montroee District, Bureau of Land Management, Montrose, Colorado.

On the fsr left, Jon Sering, Wilderness Coordinator, Division of Reeources, Montrose District, Bureau of Land Management, Montrose, Colorado.

This hearing is a public hearing for the Bureau of Land Management, Department of the Interior. The hearing has been scheduled to receive comments on the Draft Environmental Impact Statement prepared by the Bureau of Land Management, concerning the proposed wilderness

designation of 7 wilderness study areas in the Gunnison Basin and American Flste/Silverton Planning Area in the Montroee District.

The members of the hearing psnel are here to listen to your views. They are not here to answer questions while the hesring is in session. They may, however, ask clarifying questions at the conclusion of your remarks. The panel will be available during recesses in the hearings, and they will at that time welcome and attempt to answer any questions that you might have. A formal response to your comments snd queations will be contained in the final Environmental Impact Statement.

An official reporter will make a verbstim transcript of the hearing. To ensure a complete and accurate record, it is absolutely necessary that only one person speak st a time, and that everyone remsin as quiet as possible while the hearing is in progress. During the hearing, no one will be recognized other than the designated speaker and members of the hearing panel. This hearing was begun last night in Lake City, and it is reconvened tonight here in Silverton, snd will be reconvened Thursday night in Denver. The speakers will be called in the order the requests to speak hsve been received.

All parties will be expected to confine their remarks to ten minutes or less. This time limitation will be

enforced in order to ensure that everyone is treated in an equal manner.

Written comments will be accepted in lieu of oral presentations or as supplements to oral presentations. They can be submitted during the course of the hearing or any time on or before July 8th, 1982, insofar as the Environmental Impact Statement is concerned.

If written comnente are not submitted today, they should be sddressed to the District Manager, Montrose District Office, Bureau of Land Management, P. O. Box 1269, Montrose, Colorado, 81402.

All written statements that are timely received will be included as s psrt of the hearing record. Written statements will be given the same weight as oral statements made at the hearing.

For thoae who are going to make an oral presentation, it will be helpful if the reporter can obtain a copy of any prepared statement that you might have prior to the presentation of the statement. If you have an extrs copy, will you please give it to the reporter juet prior to your presentation. If you do not hsve an extra copy, it will be helpful if you can leave any written statement that you might have with the reporter after your presentation. She has assured me that if you will place your name and sddress on the statement, she will return it to you.

To the extent that time is available after the presentation of oral statements by those on the list of speakers, we will give others present an opportunity to be heard. If there are any parties who are not on the speakers' list who desire to be heard, they should register at the registration table in the back of the auditorium.

The record of this hearing, including all timely filed written statements, will be available for public inspection at the Colorado State Office, of the Bureau of Land Management, 1037 20th Street, Denver, Colorado, and in the Montrose Oistrict Office, Bureau of Land Management, on Highway 550 South, Montrose, Colorado.

Copies of the transcript of this hearing can be obtained by making arrangements with the reporter.

On the list of speakers, at this time, I have J. R. Guadagno, G. R. Swanson, John Baldus and Pat DeGrave.

Our first spearker will be J. R. Guadagno.

MR. GUADAGNO: I have a copy of this too.

All right, well, I just want to comment about one particular area that was of this study, and that is the portion of the Handies Peak Wilderness Study Area that lies south of Cottonwood Creek. That is this section down here.

Now, this area is actually part of a 50,000 acre Wilderness, which extends into the Gunnison and Rio Grande National Forests. However, like the other agencies, like both

of those forests, the BLM has treated this area as if a separate entity, and it has dropped it from further consideration because of its small size and rough terrain.

Now, in taking an action like that, I feel that Joseph Heller would be very proud of the BLM. I don't think you could find a better example of Catch 22 philosphy, and the reason behind this, the Forest Service decision is based on the premise that the world ends at the forest boundary, and the BLM believes that separate world also ends at that same boundary.

But if a person should go to this area and explore it themselves--have any of you been in this area, by the way? I suspected that.

You will find that the world doesn't end there, it continues on unbroken on both sides of the boundary, and so does the wilderness. Not only that, but the land on both sides belongs to the same owner, that is the people of the United States.

Now, this is the procedure that both agencies, both the Forest Service and the BLM are supposed to be working for, even though they often seem to forget that.

The mountains, the forests, the streams, the wildlife--all of them cross this great barrier as if it wasn't there. And they do it for a very good reason. In reality, it isn't there, because it is totally imaginary, and

so is the reason for rejecting this area as wilderness.

Now, by any of the criteria for evaluating wilderness--size, naturalness, opportunity for solitude--this area is far superior to those that the BLM is still considering for wilderness in this region.

A number of concerned citizens who realize this are now preparing a proposal to be submitted directly to Congress, since we have learned from experience that Congressmen, at least on occasion, are also capable of seeing beyond administrative boundaries.

Perhaps BLM would like to reconsider its decision in light of this fact.

Now, in order to familiarize more people with this area, I am leading a backpack trip there on the 26th and 27th of June. This will be a 17 miles hike. That is the minimum distance we could set up which would reasonably take us into the area. We could have very easily made it a 50 mile hike if we had more time. And I would like to invite any BLM personnel on this to accompany me on this trip, to find out for yourselves what a valuable resource you are throwing away so casually.

Now, I have been very critical of BLM in this presentation, and I realize that you have to go by the rules. It is not really the personnel in BLM. I think that something should be done about this.

Thank you.

MR. SERING: May I just ask you a clarifying question?

MR. GUADAGNO: Yeah.

MR. SERING: Are you asking that the BLM recommend this BLM for wilderness on that southern part of Cottonwood, or are you asking us also to recommend Forest Service?

MR. GUADAGNO: 1 am asking you to recommend that a joint study be made of all the contiguous lands, both on BLM and Forest Service, as one unit, one single unit.

MR. SERING: Thank you.

MR. GUADAGNO: Okay.

HEARING OFFICER: Thank you.

The next speaker is Gerry Swanson.

MR. SWANSON: Oh, I don't wish to comment either way on this, I am just the Mayor of Silverton, and I just want to welcome you to Silverton, and I hope that your hearing is well taken.

HEARING OFFICER: Thank you very much, sir.

The next speaker is John Baldus.

MR. BALOUS: I am not quite prepared yet.

HEARING OFFICER: Okay, we will skip you and come back to you, Mr. Baldus.

The next speaker will be Pat DeGrave.

MR. OeGRAVE: I am Pat OeGrave, and I am here

representing the Sierra Club, and I just havs a brief comment, and I would like to compliment you on the work you have done on the Whitehead Gulch, and Needles Creek and Weminuche Wildsrnsss Areas. I think you have done an excellent job on that, but I would like to exprsas our hope that you would give mors consideration to the Redcloud Peak Area, sxpanding that into making more of that area a designated wilderness area.

That's all.

HEARING OFFICER: Thank you, Ms. DeGrave.

At this time, I will recess the hearing and go off the record.

(WHEREUPON, a short recsss was taken.)

HEARING OFFICER: Okay, ladies and gentlemen, Mr. Baldus indicates he is ready, so lst's get back on the record.

Our next spsaker will be Mr. John Baldus.

MR. BALDUS: I am John Baldus of Montroae, and I am repressnting other membsrs of the Uncompahgre Resource Council, as well aa myself. We are a conservation group based in Montrose, and involved in resource issues, and we were very active in the Forsat Service Wilderness hearings and consequent designation of Forest Service Land.

Dur concern in this BLM Wildsrnsss study is mostly with the conflicts of minsral and development uas, and

according to the study that has been prssented by BLM, most of the areas have very little conflict.

Thsrs are certain areas which must be excluded because of high mineralization potential, but some of the areaa, we were quite disappointed to aee that there were no conflicts whatsoever, such as the large parts of the American Flats Study Area, Larson Creek Study Area, and the Bill Hare Gulch Study Area. We wonder what the possible rsason of the BLM might be for not recommending these areas for wildsrness.

We would like to see more exchange or consultation with the Division of Wildlife experts on the wildlife impacts, because it seems that the estimatss that are presented in this study on wildlife impacts of development--maybe that ia not quite clear--the impacts on wildlife from development seem quite optimistic, and we think that possibly ths Division of Wildlife could be very beneficial to the BLM people in offering their commenta on what levels of development might influence which wildlife areas, and their habitats.

Other development impacts also sesm quite optimistic, particularly the water quality effects, snd impacts of road development.

I particularly recall reading one of the sections which said that possible Wilderness designation could mean

that trails could produce erosion into the streama, which would effsct ths water quality.

But thsn under the development alternative, it was mentioned that roada could also influencs it, but it aesmed that there was no differsnce in the amount of impact, and it was obviously faulty reasoning.

To get a little more specific on certain areas, ws found that the Handies and Redcloud Areas aeem to be recommended for Wilderness only in the areas above timberline, and obviously these are the most spectacular parts of these areas, but by no means the only part suitable for designation as wilderness.

Some of the reaource conflicts ssem to be quite small, and it seems that a lot of the lower elevation areas would be very suitable to be designatsd as wilderness, because of the fact that they can handle larger amounts of recreational use, dispersed recreational use. The slpine and high country areas are very prime for recreational use, but they do not sllow as large a capacity in user days, and not quite sa good an opportunity for solitude and primitive and unconfined recreation as recommended.

Basically, to sum it up, we are rather disappointed in the recommendation, and we would like to see the wilderness areas recommendations expaned for a greater diversity of use of our public land.

That's all.

HEARING OFFICER: Thank you, Mr. Baldus.

The next speaker is W. Glen Phillips.

MR. PHILLIPS: Thank you.

Bureau of Land Management Officials, and members of this hearing, my name ia W. Glen Phillips, I am the Preaident of the San Juan Chapter of the Colorado Mountain Club. I live in Durango, and this is my first year--although I have been a member of the Colorado Mountain Club for many years, this is my first year as President of the Chapter. The San Juan Chapter of the Colorado Mountain Club is s small Chapter, about the smallest in the State. We have about 20 Chapters in the State, and San Juan is the amallest, we have a membership of 25 to 35 members.

And I have grown up in the San Luia Valley Area of Colorado, and I am well acquainted with the Upper Rio Grande Area. However, sincs I moved to Durango in 1960, I have become intimately acquainted with the drainages of the San Juan and the Animas River, and the Gunnison River, because I am a mountain climber and a hiker, and I know these areas--maybe not intimately, but very well.

The areas you speak of, I have led hikes into this area for years, and have climbed all of 14 in the Handies and Redcloud Areas, as well as camped in the American Flats Area, both in the summertime and in the wintertime.

I want to reiterate what Mr. Baldus has said about the surprise that he had when he read the proposal of the limited scope of these wilderness areas. And I have seen through the years what has happened over on the south side, and the east side of the Animas Square, when the Weminuche was being considered, when the small areas were allowed to be in the wilderness, and the impact that just backpackers have had on a small area where access was too readily available.

It seems as though what wilderness has been through the years has changed drastically, and even I couldn't believe the impacts that were made on these wilderness areas through the years, and I couldn't believe that the effects of some of these backpackers and hikers through these areas when they were too small, too readily availsble to many people.

That is my argument about the limited scope of these areas that you talked about here, specifically the Redcloud and the Handies Area.

The access is too easily accessible. Now, if you would have kept the boundary even half the size that it was originally intended there, maybe 50,000 acres instead of the small 11,000 acres for this area, then I think the--it has been demonstrated through the years that your scattered access to this keeps that from being tramped over and destroyed too much.

I don't know too much about the mineral qualities. I have read the proposal and studied it, and I think it is very good, exciting to read the work that is being done by your area, the Forest Service, and other agencies in initiating this wilderness study plan, but let me make my plea for the hikers in the State of Colorado that belong to the Colorado Mountain Club, specifically the San Juan Chapter, that we need more areas, a larger area here where there won't be so much concentrated use of these areas.

Thank you very much.

HEARING OFFICER: Thank you, Mr. Phillips.

Are there any questions?

MR. PHILLIPS: Yes, any questions from anybody?

HEARING OFFICER: Our next speaker is Jeanne T. Hemphill.

MS. HEMPHILL: My name is Jeanne Hemphill. I have been living in Durango the past two and a half years. I am Conservation Chairperson for the San Juan Audubon Society.

Thank you for this opportunity to make comments tonight.

Firstly, I applaud the concept of BLM Wilderness.

Secondly, I am glad to see the minimally controversial narrow arm of the study areas along the Animas River recommended for wilderness. These are the Needle Creek and West Needles contiguous.

Because I have hiked in Spencer Basin in the Weminuche contiguous WSA, I feel strongly that the area has wilderness quality, and I continue to support its inclusion in the WSA--study area--wilderness area.

Thirdly, in regard to the Redcloud Peak WSA, I understand that Alpine Gulch is a wonderfully deserving area. I would request that the boundaries be drawn further esst to include this drainage.

If access to Red Mountain is needed, the road from Lake City and east could be used.

Fourth, in regards to the Handies Peak Area, I request that BLM consider closing the road to Sloan Lake at the mine. The lake is extremely fragile, and could be destroyed by overuse. A well made trail would be a good management alternative.

I would also request that the area adjacent and north of Gunnison National Forest be considered for futher wilderness, and not be dropped at this time.

I will submit further written comments at a later date. Thank you.

HEARING OFFICER: Thank you.

Does anybody else desire to speak?

MR. SERING: May I ask one clarifying question? The last areas that you spoke of are where?

MS. HEMPHILL: Adjacent to the National Forest.

MR. SERING: Wilderness Gulch?

MS. HEMPHILL: Right there.

MR. SERING: South of Cottonwood?

THE REPORTER: I can't take it down when you are both talking.

MR. SERING: The area south of Cottonwood Peak in the Handies Wilderness Study area.

MS. HEMPHILL: Yes.

MR. SERING: Thank you.

HEARING OFFICER: Does anyone else desire to speak?

Seeing no one, and hearing no one, this hearing is in recess, and will be reconvened Thursday night in Denver, Colorado.

(WHEREUPON, the above hearing was concluded at approximately 7:50 p.m.)

REPORTER'S CERTIFICATE

The above and foregoing is a true and accurate transcription of the above hearing held on May 11, 1982, Silverton, Colorado.

Dated this 17th day of May, 1982.

Beverly Larkee
Certified Shorthand Reporter, R.P.R., C.P., C.M., and Notary Public

Response to Silverton Public Hearing Comments

1. During the study effort, BLM contacted the Forest Service and they indicated that no further wilderness study of the Carson Peak Roadless Area (#02220) is planned during the first generation of Forest Plans. Carson Peak has been recommended for a Management Direction 2A with emphasis on semi-primitive motorzied recreation opportunities. The BLM cannot force another agency into re-evaluating and studying their lands for wilderness. Neither the U.S. Forest Service nor Congress recommended these lands for wilderness designation.

2. The Division of Wildlife has been consulted. Their comments are included later in this section.

3. Under the Conflict Resolution Alternative 11, which is the proposed action, this portion of the road would be closed.

In the Matter of

GUNNISON BASIN and the

AMERICAN FLATS - SILVERTON WILDERNESS

A public hearing was held by the Bureau of Land Management on Thursday, May 13, 1982, at the Botanic Gardens, Denver, Colorado, in the above mentioned matter starting at 7:10 p.m.

Panel:

Terry Reed, Chairman
Lance Nimmo
Jon Sering

Reported by Becky S. Jackson, Shorthand Reporter and Notary Public for the State of Colorado.

PROCEEDINGS

CHAIRMAN REED: Ladies and gentlemen, may I have your attention, please? We will now reconvene the hearings on the Gunnison Basin and American Flats/Silverton Wilderness Impact Statement. My name is Terry Reed. I am the Area Manager of the Bureau of Land Management, Montrose District. I have been asked to preside over the hearing tonight.

A hearing panel has been designated to receive your comments. The members of the panel are myself, Terry Reed, Area Manager for Gunnison Basin Resource Area, Bureau of Land Management, Montrose District, Montrose, Colorado; to my left, Lance Nimmo, Environmental Impact Statement Team Leader, Planning and Environmental Coordination Staff of the Montrose District of Bureau of Land Management, Montrose, Colorado; and on the end, Jon Sering, Wilderness Coordinator, Division of Resources, Montrose District, Bureau of Land Management, Montrose, Colorado.

This hearing is a public hearing for the Bureau of Land Management, Department of the Interior. The hearing has been scheduled to receive comments on the Draft Environmental Impact Statement prepared by the Bureau of Land Management concerning the proposed wilderness designation of eight Wilderness Study Areas in the Gunnison Basin and American Flats/Silverton Planning Area in the Montrose District.

The members of the hearing panel are here to listen

to your views. They are not here to answer questions while the hearing is in session. They may, however, ask clarifying questions at the conclusion of your remarks. The panel will be available during recesses in the hearings, and they will at that time welcome and attempt to answer any questions that you might have. A formal response to your comments and questions will be contained in the final Environmental Impact Statement.

An official reporter will make a verbatim transcript of the hearing. To ensure a complete and accurate, it is absolutely necessary that only one person speak at a time, and that everyone remain as quiet as possible while the hearing is in progress. During the hearing, no one will be recognized other than the designated speaker and members of the hearing panel.

This hearing was begun Monday night in Lake City, reconvened Tuesday night in Silverton, and is reconvened tonight here in Denver.

The speakers will be called in the order the requests to speak have been received. All parties will be expected to confine their remarks to five minutes or less. If we have sufficient time at the end, and you wish to add additional remarks, we will try to accommodate that. The number of speakers that have signed up will limit it to five minutes. This time limitation will be enforced in order to

ensure that everyone is treated in an equal manner.

Written comments will be accepted in lieu of oral presentations or as supplements to oral statements. They can be submitted during the course of the hearing or any time on or before July 8, 1982, insofar as the Environmental Impact Statement is concerned.

If written comments are not submitted at this time, they should be addressed to the District Manager, Montrose District Office, Bureau of Land Management, Post Office Box 1269, Montrose, Colorado 81402. All written statements that are timely received will be included as part of the hearing record. Written statements will be given the same weight as oral statements made at the hearing.

For those who are going to make an oral presentation, it will be helpful if the reporter can obtain a copy of any prepared statement that you might have prior to the presentation of the statement. If you have an extra copy, will you please give it to the reporter just prior to your presentation? If you do not have an extra copy, it will still be helpful if you can leave any written statement that you might have with the reporter after your presentation. She has assured me that if you will place your name and address on the statement, she will return it to you.

To the extent that time is available after the presentation of oral statements by those on the list of

speakers, we will give others present an opportunity to be heard. If there are any parties who are not on the speakers' list who desire to be heard, they should register at the registration table in the back of the room.

The record of this hearing, including all timely filed written statements, will be available for public inspection at the Colorado State Office of BLM, 1037 - 20th Street, Denver, Colorado and the Montrose District Office of BLM on Highway 550 South, Montrose, Colorado. Copies of the transcript of this hearing can be obtained by making arrangements with the reporter.

We have 23 speakers signed up to speak. I'll read off the list of names and then we'll begin with the first name on the list.

Gordon Pine, Minerals Exploration Council; Douglas Smith, Jr.; Colorado Open Space Council, an individual representing Colorado Open Space Council. It's not Douglas Smith apparently.

I'll need to get the name of each individual representing groups that we have signed up to testify.

The Wilderness Society; No. 5, Doug Hirschman, Mapco Minerals Corporation; No. 6, a representative of the Sierra Club; No. 7, Colorado Mountain Club; No. 8, University of Colorado Wilderness Study Group; 9, Noranda Exploration, Willy Lynch; 10, James Gehres, No. 11, Mark Pearson; No. 12,

Ted Keragote; No. 13, Gary Goss; No. 14, Mary Gilbert; No. 15, Carl Hinrichs; No. 16, Rosalind McClellan; No. 17, Marian Senior; No. 18, Kim J. McLacklin; No. 19, George Saum; No. 20, Roger Fuehrer; 21, Ron Sinton; 22, David N. Kopec; No. 23 is Bernard Zelymen; and No. 24 is John Fredrickson.

We'll begin with Gordon Pine. And if you would, come up to the front so the reporter can hear your testimony.

MR. PINE: My name is Gordon L. Pine. I am employed by Conoco Incorporated in Denver as a senior geologist, and I am representing the Minerals Exploration Coalition.

I have reviewed the DEIS on the Gunnison Basin and the American Flats/Silverton Wilderness Proposals, and would like to comment on it.

The total area under study in these eight WSAs is 78,135 acres. Of this acreage, 41 percent or 31,790 acres is either owned, claimed, or leased for mineral purposes. Using the maps and data provided in the DEIS, approximately 46 percent of the total acreage in the eight WSAs has been classified as having high mineral potential, 37 percent as moderate mineral potential, and only 17 percent as low mineral potential.

During the BLM selection process, the preferred alternative has reduced the amount of wilderness acreage by approximately 65 percent to some 28,415 acres. Approximately 55 percent of the wilderness under the preferred

alternative is either owned, claimed, or leased for mineral purposes. Using the maps and data from the DEIS, approximately 50 percent of the recommended wilderness has high mineral potential, 41 percent has moderate mineral potential, and only 9 percent has low mineral potential.

Thus it appears that the BLM's preferred alternatives are in conflict with Section 102A12 of Public Law 94-579. The latter states that ". . .the public lands be managed in a manner which recognizes the Nation's needs for domestic sources of minerals, food, timber, and fiber from the public lands. . ." It should be noted that the two WSAs with the lowest mineral potential, the Bill Hare Gulch and Larson Creek, have a non-wilderness preferred alternative.

It is difficult, if not impossible, to identify tracts of BLM land recommended for wilderness designation in the Gunnison Basin-American Flats/Silverton Area that do not have severe conflicts with existing mining activities as well as isolated parcels of private and State land. The inclusion of these parcels into a wilderness will present administrative and management problems. Public Law 88-577 with reference to parcels of land within a wilderness area dictates ". . . such State or private owner shall be given such rights as may be necessary to assure adequate access to such State-owned or privately-owned land. . ."

The Silverton Area is one of the most highly altered

mineralized and productive mining areas in the United States. The area has produced and has potential for increased production of base metals, precious metals, and uranium. The number of major companies and small miners that have mineral rights and are conducting exploration in the area is large. A few of the major companies are Noranda, Molycorp, Bear Creek, Exxon, Phelps Dodge, Uranerz, and Homestake.

If these areas are designated as wilderness, there will undoubtedly be conflicts between the BLM and those companies and miners with regard to access to existing valid claims. There will be administrative and management problems with unpatented claims similar to those associated with parcels of private and State land discussed above. In all probability, complex and costly litigation will be necessary to resolve the issues.

In many instances the small one- or two-man mining operation is the precursor to major mining development. Maps pertinent to the WSAs in question indicate numerous small prospect pits and mineral occurrences. A normal sequence of events for a mineral deposit would be for a small miner or prospector to submit his small block of claims to a major company. After examination, if the area looked interesting, the large company would probably stake or acquire additional land and conduct an extensive exploration program. This could result in the discovery of a larger, economically

workable deposit. This evolution is now taking place in the Gunniaon-American Flata/Silverton Area.

If these areaa atudied under the DEIS are given wilderness classification, then in all probability, their mineral potential will never be evaluated. A major problem facing BLM mineral examiners and exploration geologists is the fact that they cannot see beneath the earth's surface. The only true evaluation test is to conduct drilling and assay the results of that drilling.

If one searches old geologic reports, one can find erroneous conclusions as to the lack of mineralization in specific areas. A specific case is the area southwest of Tucson, which was declared to have no mineral potential approximately fifty years ago. Today that area is a major copper producer in the United States.

Both technological and economic changea have a tremendous effect on mineral resources and reserves. A significant decrease in the availability of vital metals, whether for political or economic reasons, has a drastic effect on the price we muat pay for that metal. It is very difficult to quantify and predict changes in technology and economics. What is considered waste today could be commercial ore in the not too distant future.

To this point, I have been speaking in generalities. Time does not permit an extended discussion of specific WSAs

or a detailed geologic description of the areas. However, I feel a few specific examples should be included.

For the Weminuche WSA, the BLM's preferred alternative ia wilderneaa classification for a small parcel of 365 acrea, but approximately 45 percent of this parcel ia private or State ownership.

For the Red Cloud Peak WSA, I quote from the DEIS, quote, ". . . an extremely high probability of the exiatence of ore-grade material exiata throughout the area." Uranerz has a group of lode mining claims covering approximately 75 percent of this area.

The proposed wilderneaa in the Whitehead Gulch WSA includea a 640-acre parcel of State land, numerous mining claims owned by Exxon, and the area has been clasaified as hsving good mineral potential.

In summary, the bulk of the areaa recommended for wilderneas have clear, unmistakable high mineral potential. The land ownership is fragmented with State, Federal and private parcela. Valid righta to acceaa to develop claims make the area essentially unmanageable as a wilderneas. Trading off the mineral values of this area for aingle-purpose wilderneas lockup is economically and atrategically ill-conceived.

I urge you to adopt a multiple-uae alternative which will permit harvest of the reaources that nature offers

ua in these areas. Thank you.

CHAIRMAN REED: Thank you, Mr. Pine. The next speaker will be Douglas M. Smith, Jr.

MR. SMITH: The Gunnison Basin and American Flats/Silverton Wilderness Study Areas are located adjacent to the great Silverton mining region. Production from the classic vein mines of this area totals more than 36 million tons of gold, silver, copper, lead, zinc ore which even at today's depressed prices represents a gross metal value greater than $4.2 billion.

Although most of the mines are now idle, continuing geologic studies by both government and industry scientists indicate that porphyry-type mineral deposits may exist below some of the veins. The multicolored hydrothermal alteration zones such as those found near Red Mountain Pass and Red Mountain above Lake San Cristobal are also highly indicative of this type of deposit. Perhaps the greatest concentration of these indicators of mineral deposits in the entire United States is found in the San Juan Mountains and, particularly, in the vicinity of Lake City. If the porphyry deposits do indeed exist, then billions of pounds of copper and/or molybdenum remain to be discovered and produced.

In the event that discoveries are made, the deposits will moat likely occur 5,000 to 10,000 feet below the aurface and will be mined by underground methods. Unless they possess

metal contenta abaolutely undreamed of in the geologic world, they will not be touched until sometime in the Twenty-first Century. At this time the world's current inventory of deposita will have been exhausted.

Any doubta about the need for new deposits can be quickly dispelled by consulting the attached grapha for copper resourcea which are representative of nearly all metala

The first showa the increasing diaparity between the quantity of ore treated and the amount of copper recovered Even more alarming is the hugh gap which is projected to occur between consumer demand and resource aupplies which ia ahown in the second attachment.

Thus, without new deposits, the law of supply and demand will soon force the price of copper and most other metals into the realm of precious metals.

Geologic evidence for the existence of buried mineral deposits is particularly abundant in the Gunnison Basin and American Flats/Silverton Wilderness Study Areas.

Typical of the high eateem given to these areas by exploration geologits is the Red Cloud Peak preferred-alternative study area, 72 percent of which is covered by mineral claims. Yet, because of the evolutionary nature of geologic science, these claims may one day be abandoned in favor of a new location, and, at best, only one out of 1,000 of the claim groups actually tested by drilling will contain

a mineral deposit. It is an unfortunate fact that only a very few indicator alteration zones actually occur in association with metal or mineral deposits.

These overwhelming odds against making an economic mineral discovery require that the maximum poasible amount of land be available for exploration. This is particularly true now when more than 60 percent of the minerals and metals consumed in the United States are imported from other countries.

Let us not forget that the health, education, and welfare of this country are not only sheltered within walls constructed of metals and minersls, but are largely financed by taxes from the mining, the manufacturing industries which use minerals and metals, and the service industries which support them.

I urge the BLM to adopt the "no wilderness" alternative for the entire Silverton-Lake City region while keeping in mind that the existing regulations governing exploration and mining will guarantee that no harm comes to the land.

I'd like to add at the end that the level of geologic expertise contained in the DEIS is next to nonexiatent, and I believe the BLM is charged to make a thorough geologic study as well as any other type of study, be it wilderness or grazing or timber or whatever. And the level of expertise used in the DEIS seema to be merely the

measurement of the number of patented or unpatented claims which are contained within a certain area. But I see nothing about the science of geology involved here.

CHAIRMAN REED: Thank you, Mr. Smith. I have a representative of the Colorado Open Space Council who wishes to testify.

MR. MULLEN: My name is Norm Mullen, and I'm with the Colorado Open Space Council or COSC. COSC is a statewide coalition of about 47 conservation groupa through Colorado. Many of those groups will be represented here today.

COSC and its member organizations have studied these areas in the Gunnison Basin for about the last ten years and have made recommendations to BLM throughout that process.

We support wilderness for much of the area studied in the Gunnison Basin DEIS. I'd like to note that only about 1 percent of the lower 48 is designated wilderness, but 4 percent of Colorado. We're lucky enough to have a little left here.

These areas in the Gunnison Basin are BLM's only high-peak wilderness areas in the country. They also contain-- some of these areas contain important additiona to Weminuche and Big Blue area, so it's very important that these areas have sensible boundaries; that agency boundaries aren't the only divisions between wilderness and nonwilderness.

And I think the DEIS offers an important opportunity

to round out those areaa. Specifically we're supporting the management alternative for Red Cloud Peak. Just the mere presence or supposition that minerals exist in an area should not be cause for dropping this area from wilderness consideration.

Also we support the entire Handies Peak area. Of the wilderness study area, Handies Peak is contiguous on the south to a major Forest Service wilderness, and should be managed for wilderness in conjunction with that wilderness area.

We support the BLM's alternative for American Flats and for the rest of the areas, with the exception of Weminuche contiguous area where we would like to support the entire area for wilderness recommendation as contained -- right now that's contained in a land exchange probe before Congress, so we would like to see the whole area recommended for wilderness.

And also we support for Larson Creek and Bill Hare Gulch, we support managsbility for both those WSAs. I will let the following people fill in more of the details on that, but that's basically where our studies have shown deserve wilderness consideration. Thank you.

HEARING OFFICER REED: Thank you, Mr. Mullen. A representstive of the Wilderness Society would like to testify?

(No response.)

CHAIRMAN REED: Next on the list is Doug Hirschman, Mapco Minerals Corporation.

MR. HIRSCHMAN: As the gentleman said, my name is Doug Hirschman, and I'm a landman with Mapco Minerals Corporation. Mapco ia active in the exploration and development of precious metal deposits.

In my review of the subject Draft Environmental Impact Statement, the thing that stuck out most in my mind was the fact that the high mineral potential for the majority of these wilderness study areas -- Gordon Pine who spoke, was the first speaker, touched basically on what I had to say about the percentages, but I'd like to repeat it. As far as the total mineralized land within these wilderness atudy areas, 55 percent has been set aside or recommended for wilderness inclusion in the preferred alternatives.

The high mineral potential is at 50 percent, moderate mineral potential is 41 percent, low mineral potential is at 9 percent.

I guess this suggests something to us, and I think that is that this area is one of the most highly mineralized and explored areas in southwestern Colorado. And it makes me question whether or not we should really be trying to withdraw lands within an area that has such great potential.

One of the other things that bothers me about --

well, it wasn't even touched on in the Environmental Impact Statement -- was the administration of these areas as a result of all the mining claims and man-made improvements that have taken place in this area because of the exploration.

I think it would be very costly, very complex, and very time consuming to resolve all the conflicts and problems that are going to arise because the BLM has to either validate or invalidate the mining claims that exist in the wilderness study areas.

The Draft Environmental Impact Statement touched, I thought,very fairly on those minerals that were in these wilderness study areas such as silver, copper, lead, zinc, but it also touched on specifically in the Handies Peak area about nickel -- or nickel anomaly, I should say -- which in the mineral business we would hope would turn into some possible deposit. And as we all probably know in this room, nickel is one of the strategic minerals. This country is very dependent on foreign sources for its supply. I think that's very critical to know. I don't think this country can afford to lock up or withdraw lands that have strategic mineral potential.

The statement went on to discuss the values from recreation that would be benefited if these areas were withdrawn into the wilderness category. But it touched very lightly on the benefits that would occur if these areas were

nonwilderness -- were designated nonwilderness and allowed to be developed for its mineral potential.

I think one mine in this whole area would probably be of more benefit to the local, state, and nation -- national economies than all of the income or whatever you want to call it from the recreation that you would have from all these wilderness study areas.

To touch on that point a little further, I think the local economies in these areas would probably be -- suffer greater economic crunch if these areas are withdrawn because what you're, in fact, doing is withdrawing the only resource in which they have to increase their economic base. I don't feel that the recreation is going to benefit local communities because those monies and that type of expense is usually incurred by an individual where he resides rather than in the area next to the wilderness study area.

2 The Draft Environmental Impact Statement has an appendix, 1.1, which discuss the criteria used for selecting or designating these areas as suitable or nonsuitable for wilderness. And, more specifically, 8A of that appendix discuss the mandatory wilderness characteristics, and I quote, "Quality of the areas mandatory wilderness characteristics are size, naturalness, and outstanding opportunities for solitude or primitive recreation."

If you go further into the Impact Statement,

Appendix 4.5 discusses the recreation opportunities in all of these wilderness study areas. And only one wilderness study area, Red Cloud Peak area, has primitive recreation opportunities. I think this is a very important factor. I don't understand even why these areas were recommended if they don't have one of the prime criteria that's been defined in the wilderness definition as set out in the Wilderness Act. In particular, Handies Peak does not have any primitive recreation values and -- according to the appendix, and 29 percent of it has roads in it.

2

So, in conclusion, I would say that we agree with the designation by the Draft Environmental Impact Statement of the Bill Hare Gulch and Larson Creek areas for nonwilderness. And we would recommend that the remaining WSAs be reclassified as nonwilderness due to a lack of primitive recreation opportunities and high mineral potential.

We may be only kidding ourselves if we believe we are doing our generation and future generations a favor by withdrawing these areas for recreation purposes. The reason being as a result of withdrawing these areas of high mineral potential we force this country to become increasingly dependent on foreign sources for our supply of raw materials which are needed to keep this country strong and resistent to Communist aggression and retaining the freedom to

allow us to participate in such public hearings as the one tonight. Thank you very much.

CHAIRMAN REED: Thank you, Mr. Hirschman. Is there a representative of the Sierra Club who would like to testify?

MR. STANSFIELD: My name is John Stansfield, and I'm from Colorado Springs, and I'm representing the Rocky Mountain Chapter of Sierra Club here tonight. I'm currently the Bureau of Land Management Wilderness Coordinator for the chapter.

First of all, we'd like to compliment Montrose District of the BLM on the excellent job of documentation that they've done, not only with the Draft Environmental Impact Statement and the information which it provides, but also for the constant and continuing documentation that they have provided throughout the wilderness inventory and the wilderness study process. It's been very helpful with it, and they've done an admirable job. It's enabled the public, I think, to become involved much more completely than the public has been able to be involved by other agencies and other processes which shall remain nameless at current.

I would, in the interest of time, like to tick off those briefly, list a few of the points that we have in relation to the area and then beg to submit more detailed and lengthy comments at a later date in the period.

Starting with Red Cloud and Red Cloud Peak area, we support the alternative listed in the Draft Environmental Impact Statement as the managability alternative for a number of reasons, some of which have already been enumerated by Norm Mullen, and I know other people here tonight will indicate those.

In Handies Peak and the Handies Peak area we strongly support the all wilderness alternative as opposed to the conflict resolution alternative supported by the Bureau.

In American Flats we do support the so-called conflict resolution alternative, and that has been proposed by the Bureau.

In both Bill Hare Gulch and Larson Creek, those two small areas, we support the manageability alternative rather than the no wilderness recommendation for a very specific reason. Those areas indicated as the manageability alternative, if deaignated wilderness, will provide an excellent, as Norm mentioned, rounding out. They would provide more adequate, more geographically representative boundaries for the existing Big Blue Wilderness. And because of that they seem very small and unimportant, and yet, in terms of manageability, in terms of the wilderness itself, in terms of representing full geographic features and having excellent boundaries, we feel that those areas would really help in terms of Big Blue and would hslp both agenciea of

the Forest Service and they would have primary management.

In responsibility, they have the lion's share of the land mass, and the wildernesa lands that could be added, small though they may be, would definitely help future management for those areas for the Big Blue.

We support the manageability alternatives for Weminuche contiguous as BLM has recommended, for White Head Gulch, and for Needle Creek as well.

In reviewing the DEIS in general, there are just a couple of specific points that we would like to rsise at this time. First of all, in terms of the larger areas, in terms of Handies Peak and Red Cloud specifically, we would like to fault one aspect of the consideration for those areas that has been given for the selection that hss been made. That ia the conflict resolution alternative as it's called.

There's one thing about wilderness designation that we have seen, and we've been in the wilderness business a long time, and that is that although the objective, the goal for designation of an area may be paramount, in certain people's minds -- other people disagree, that's obvious -- but the most important thing to realize and to look at I think is the record Congress is designating wilderness.

Congress quite often, more often that not, I would say probably in the great majority of wilderness designations

it has done, has not choaen to try and mitigate all the potential conflicts and impacts. What Congress has done is look at the lands in their wild state and try to make recommendations, has tried to designate those areas, in large part, that represent the true wilderness values in the area.

We don't feel, especially in Red Cloud Peak and in Handies, the recommendations and the conflict resolution alternative stated by the BLM, recommended by the BLM, that those, in fact, do represent the true wilderness, the true wilderness values that exists there.

I've seen the Forest Service go down the road, propose high peak rock and ice wilderneas. I've seen Congress turn around on almost every occasion and designate larger areas more representative of ecosyatems, more representative of broader wilderness values, go away from the snow and rock and ice and tundra only wilderness designation.

So we would recommend to the BLM in the case of Red Cloud and Handies that they too make their recommendations more representative of broader wilderness values, more representative of larger numbers of ecosystems and different areas in terms of elevation and recreation possibilities.

The second point that we'd like to make, and a point which I think is well documented and well justified in the DEIS is the contention, true as it is, that the areas in Gunnison Basin-American Flats/Silverton are surrounded by

much designated wilderness. That is undeniable and that is true. But, I think it's important to realize again and to come back to the same point again that where the Forest Service, the manager of all those partly designated wildernesses, recommended this small, high-peak, rock and ice wilderness, but that's not what we've ended up with.

So I think the BLM can learn something from the record of Congress, from the history of wilderness legislation in Colorado, and look to that record in their recommendations to Congress, proposing larger areas more representative of true wilderness values in Red Cloud Peak and in Handies. Thank you.

CHAIRMAN REED: Thank you, Mr. Stansfield. Is there a representative from the Colorado Mountain Club that wishes to testify?

MR. SAUM: My name is George Saum, snd I'm the president of the Colorado Mountain Club.

The Colorado Mountain Club appreciates this opportunity to offer ita comments on the Wilderness Draft Environmental Impact Statement for the Gunnison Basin and American Flats/Silverton Planning Units.

The Colorado Mountain Club is a non-motorized, outdoor recreation and conservation organization of more than 6800 members in twelve chapters spread across the state. We sponsor hundreds of trips each year onto public

lands in Colorado including the wilderness study areas in the Gunnison Basin and American Flats/Silverton Planning Units.

Our members frequently visit the Red Cloud and Handies areas. We maintain peak registers on the fourteeners. The wilderness, solitude and primitive recreation opportunities that we find there are amply described in the DEIS. These wilderness study areas provide the BLM with an opportunity to preserve its only high mountain wildlands. We are disappointed to see, instead, that the agency has recommended only minimal acreage for protection. If the preferred alternative is chosen, much of what our members and other visitors enjoy in these areas will be lost.

One needs only to read the DEIS to find more than adequate reasons to protect the entire Handies area and the wilderness management alternative for Red Cloud. The DEIS admits that its preferred alternatives would leave the wildest portions of both these areas unprotected. Both primitive and developed recreation, the DEIS admits, would be adversely affected by the conflict resolution alternatives. Scenery, watershed and wildlife could be significantly impaired by these conflict resolution alternatives.

The DEIS projects that visitor use from 1980 to 2000 will increase fivefold in these areas, if Handies and Red Cloud are fully protected. This projection indicates that

the BLM recognizes the exploding demand by the public for primitive outdoor recreation. This demand requires wildlands, a resource that is being continually depleted at an alarming rate. Yet the DEIS recommends alternatives that would accelerate this depletion instead of protecting acreage that could contribute to satisfying this strong public demand.

The economic consequences of the various alternatives are important. The DEIS estimates no significant adverse economic impact from wilderness designation of the entire Red Cloud and Handies areas would occur. Only future mineral development might be adversely affected. Indeed, the DEIS notes that tourism, the leading industry of Hinsdale County, would be enhanced by complete protection of these areas.

Yet the DEIS chooses alternatives that sacrifice admitted major recreational, scenic, watershed and wildlife values and threaten to impair Hinsdale County's leading industry for only one non-renewable value: that of minerals. This trade-off is unacceptable to us. We ask that the Bureau of Land Management recommend the entire Handies wilderness study area and the entire Red Cloud manageability alternative be added to the National Wilderness Preservation System.

In addition to these comments and recommendations, the Colorado Mountain Club urges the BLM to adopt Alternative C for American Flats, Alternative A for Needle Creek,

Alternative C for Whitehead Gulch, Alternative C for the Weminuche contiguous area, and Alternative C for the Bill Hare Gulch/Larson Creek areas.

Thank you again for holding this hearing in Denver and giving us the opportunity to present our views.

CHAIRMAN REED: Thank you, Mr. Saum.

MR. NIMMO: Could we get a clarification on this? The letter designation that you referenced on the alternatives?

MR. SAUM: Yes?

MR. NIMMO: Where are they coming from?

MR. MULLEN: Out of the DEIS.

MR. NIMMO: They're not identified in there by letters.

MR. MULLEN: I believe they could be from the alternatives circulated in August, 1981. We'll furnish the information.

MR. NIMMO: If you would, please.

CHAIRMAN REED: Is there a representative of the University of Colorado Wilderness Study Group?

MR. PEARSON: My name is Mark Pearson. I'm representing the University of Colorado Wilderness Study Group which has done studies of potential wildlands in Colorado for the last twelve years now.

Well, we support the preferred alternatives for those WSAs adjacent to the Weminuche wilderness, and those

Weminuche contiguous, Whitehead Gulch and Needle Creek.

We do not agree with the preferred alternative for Handies Peak. 5,000 acres of the eastern portion of the area has been excluded. That's the lowest conflict portion of the area and has been excluded, quote, because of the topography. Well, the world does not end at the BLM/Forest Service boundary. It is silly to exclude that area just on the basis that it looks funny on the map.

It's been called unmanageable because it's bounded by roadless Forest Service lands, but everything else that is bounded by roads is called manageable. And it certainly seems that you're going to have a harder time managing access from roads than you are from Forest Service back country areas. So I think you should go back and look at your criteria for manageability of Handies.

Then moving on to Redcloud, I'll have to congratulate the BLM. They have almost eliminated every single tree from their preferred alternative. But the nicest portions of the area which are Alpine Gulch and some of the draws which show a diversity of ecosystems within the area, they've all been eliminated. And I'd like to see a little more rationale for precisely why they're excluded.

If it's because of the State owned minerals -- some of the State owned mineral sections there, then perhaps some reference can be made to possibilities of exchange with the

State with those minerals to resolve the potential conflicts along those lines.

The biggest thing we've heard today about Redcloud is that it's got too many minerals in it. I would refer to the BLM's Wilderness Study Policy regardless that the gentlemen from industry seemed to think that the Policy is a sufficient mineral study done of the area. The geology, energy, and mineral resources will be done by USGS and Bureau of Mines before any wilderness recommendations are afforded to Congress.

But if you look -- if you go and look at the mining claims in Redcloud, if you happen to look at Township 43 North Range 5 West, which has 620 mining claims in it, it's smack dab in the middle of Redcloud, includes most of Redcloud wilderness study area, you will find that out of those 620 mining claims exactly 10 date from 1952. 610 or 98 percent of those date from 1979 or 1980 or 1981.

So all of these -- there is not long-standing mineral interest in Redcloud wilderness study area. That 1979 date also coincides with when Redcloud was recognized as a potential wilderness area. So I would suggest that all those wilderness -- or all those mining claims in this potential wildernesa, which pretty much have been staked by the four groups, that those are the result of speculation and people trying to cover themselves before the 1984 minerals deadline of the Wilderness Act.

And those claims are not small entrepreneurs. They're all large corporations that have blanketed every single section of the area.

Well, I would conclude with the statement that it's unfortunate that I think the nicest portions of Redcloud have been excluded, and I would like to see specific rationale given for why Alpine Gulch was not included in the Redcloud wilderness study area. And I'd like to see a little more clear thinking on the entire Handies Peak area, why the eastern portion which has the lowest and fewest amount of conflicts cannot be recommended for wilderness also. Thank you.

CHAIRMAN REED: Thank you, Mr. Pearson.

The next person wishing to testify is Will Lynch from Noranda Exploration.

MR. LYNCH: My name is Wiily Lynch, and I'm a project geologist for the Rocky Mountain District of Noranda Exploration, Incorporated.

Noranda is a modern and aggressive minerals exploration company, and we at Noranda are in the business of finding economic mineral deposits. Our work takes us to areas that have the potential for major discoveries of mineral deposits.

The Gunnison Basin and the American Flats/Silverton Wilderness Study Areas have a long history of mineral exploration and development and possess an excellent potential

for significant mineral discoveries. We have been actively exploring in and about the study areas for the last several years and currently have control on claims in the Handies Peak area near Snare Creek and adjacent to the Handies Peak area of Treasure Mountain.

We hope to be able to continue our exploration activities at these locations and to develop a new mine or two in the area. However, after reviewing the Draft EIS, we have concluded that the proposed wilderness classifications pose a serious threat to the continuation of our exploration and development programs.

The Draft EIS is a concise and complete document which clearly inventories the resource potentials and values of the study areas. But, the recommended wilderness boundaries do not fully take into consideration the mineral resource potential of the areas.

A small amount of high mineral potential land might be acceptable within a wilderness area. However, since over 90 percent of the recommended wilderness lands have high to moderate mineral potential, the BLM preferred alternatives for wilderness are unacceptable. It is almost as though the BLM feels forced into recommending some acreage as wilderness just because they have gone through the inventory process. The consequences of classifying lands with high mineral potential as wilderness are too detrimental to be allowed.

BLM wilderness classifications will be equivalent to withdrawal of an area from any additional mineral exploration or development activities because the designation will likely follow the 1983 exploration deadline in the Wilderness Act. Areas like the Gunnison Basin/Silverton study areas are unique in their richness of mineral potential, and this nation cannot afford to lose this important mineral resource.

Wilderness classification does allow for continued exploration and development work on valid claims -- claims which amount to over 50 percent of the recommended wilderness lands. However, the cost of exploration and development and the problems and cost of managing these activities will be prohibitive.

We support the no-wilderness alternatives for all of the proposed study areas. The current BLM Regional Management Plan already has created a de facto wilderness status for the study areas -- that is, wilderness with a small W -- where the land is managed as wilderness. Congressional wilderness classification -- that is, wilderness with a capital W -- will have far more negative impacts than positive.

To summarize our feelings concerning wilderness classification of lands in the Gunnison Basin/Silverton study areas, I would like to quote an official BLM road sign posted

on the Cinnamon Pass Road near Handies Peak. The sign reads, "There are no abandoned mines -- only idle ones waiting to be reopened."

We support the only management alternative, the no-wilderness alternative that will prevent the unnecessary abandoning of idle, active, and potential mining activities in the Gunnison Basin and Silverton areas.

CHAIRMAN REED: Thank you, Mr. Lynch. The next person wishing to testify is James Gehres.

MR. GEHRES: I'm James Gehres. I'm qualified to speak on this area because of the fact that, with the exception of perhaps a few sheepherders and turn-of-the-century propsectors, there are few, if any, who have traveled the area more extensively than I have. I have visited the area every year for about -- well, on the average of once a year for the last twenty years. And I've sometimes spent the better part of a week there. I have often entered through the Silverton side from the west as well as through the much more common Lake City approach from the east.

I've been on top of the three fourteeners in the area seven times each. I have climbed Niagara, Jones, and three other peaks in the area which exceed 13,000 feet but remain unnamed. I have either walked or looked down on virtually all the high ridges in the area.

The peaks in this area are, for the most part, gentle

and lend themselves to safe ascent by the inexperienced or by those who possess less than maximum stamina.

Now, there is some challenge presented in finding the trails, but a little advance planning and research will reward the adventurer with paths to take them through the below-timberline obstacles.

The scenery from the high points is most spectacular. The area is surrounded on all sides by jagged peaks such as Wettsrhorn and Uncompahgre to the northeast, the Sneffels group to the west, and the San Juan Nesdles to the south.

It is obvious that there have been long past mining activity in the canyons, but I have never during the twenty years I've been in there observed any helicopters used by prospector or all the other methods. I've heard the talk about the mining claims. I have yet to see my first mining claim in the area that I believe we're talking about. This has led me to conclude that there really isn't that much interest in the area by modern mineral developers.

I believe that the Bureau of Land Management should make a final recommendation for wilderness classification for the entire Handies Peak area and for the wilderness management alternatives for the Redcloud Wilderness study area.

CHAIRMAN REED: Thank you, Mr. Gehres. The next person wishing to testify is Ted Kerasote.

MR. KERASOTE: My name is Ted Kerasote. I'm a free-lance journalist and also the camping editor for "Sports and Field" magazine.

This evening I'd like to make the point that the wilderness study areas in question, the Gunnison Basin and American Flats/Silverton Planning Units, are really integral parts of a larger and well-defined environment, namely the San Juan Mountains.

The broad outlines of this area are circumscribed by Highway 50 and the Gunnison River on the north, Highway 550 between Montrose and Durango on the west, Highway 160 on the south, and Colorado 149, the Slumgullion Pass Road, on the east.

I believe a strong claim can be made that the mountainous country within these boundaries ought to be viewed as a whole for ecological and aesthetic as well as administrative reasons.

While employed by the Colorado Outward Bound School as a course director and instructor, I made my home in Lake City and worked fifteen 23-day courses, summer and winter in this region. I walked its length and breadth on numerous occasions, hunted, fished, and skied there, and have made many ascents of its peaks, including some first ascents on all the fourteeners in question tonight.

While hiking in what I shall rather immodestly call

the Greater San Juan Wilderness Area, I never noticed that I, my students, or any other backcountry travelers, including the deer, elk, coyote, eagle, sheep, bear, and cougars that we saw, noticed a change in the pristineness of the land as we crossed Forest Service and BLM boundaries.

Furthermore, from November until July, the three unpaved, four-wheel drive, jeep roads that trisect the area east to west; namely, Engineer, Cinnamon, and Stony Pass, are closed by snowdrifts measuring as high as 40 feet. During these months, three-quarters of the year, the San Juan Wilderness Area is truly a unified whole in which, as the Wilderness Act of 1964 states, the works of man do not dominate the landscape.

To those who claim that granting wilderness status to this region, particularly those blocks that have the potential to be minerally productive, would decrease the economic opportunities for residents of the area, I can only reply that, after having lived in Lake City for a couple of years, my intuitive feeling is that my friends would rather make their living as members of the service-oriented tourist industry that has begun to flourish there, and would no doubt increase if wilderness status were granted, than as underground, hard rock miners.

Last and not least, and above and beyond all the economic reasons for adding as much land as possible to this

high quality air, water, and wildlife shed, I would like to reemphasize the emotional and aesthetic reasons for preserving the region as a unified whole.

The San Juans run with streams named Animas, Sunlight, Wildhorse and Cimarron. Its peaks are called Eolus, Redcloud, Sunshine and Uncompaghre. And the songs of its coyotes echo in high basins where one can still have the feeling that one is the first person to have walked there. Few places within this state still possess that sort of poetry and romance.

By granting wilderness status to the entirety of the areas in question, the alternative referred to in the Draft Environmental Impact Statement as Alternative 1, ws would be sanctioning and protecting by law what now already exists in spirit.

CHAIRMAN REED: In order to give the reporter a break and give everybody a chance to stretch, we will take a ten-minute break now.

(A recess was taken.)

CHAIRMAN REED: We'll reconvene the hearing now. The next speaker is Gary Goss.

MR. GOSS: My name is Gary Goss. I'm from Fort Collins, and I'm representing myself.

I'm disturbed by a phenomenon that seems to be emerging in the analysis of federal land for potential

wilderness designation. It seems that only lands deemed to be unsuitable for natural resource extraction or harvesting are recommended for wilderness protection. This concept totally ignores the intrinsic value of wilderneas itself.

Wilderness provides a temporary source of solitude and beauty for millions of individuals each year. Should anyone doubt this, they need only to talk with those men and women charged with the responsibility for overseeing wilderness areas. Wilderness provides the stunning scenery that Colorado's tourist industry so much depends on. Wilderness provides watersheds and wildlife habitats.

These values seem to be ignored if any potential for resource development is present. Yet these values are extremely important to America and her citizens. Polls consistently show that most Americans favor more wilderness lands.

Wilderness is forever. Resource development is temporary, but the resulting devestation is usually permanent. We must protect our most scenic lands from such devestation.

Some would say we are asking for too much, but the truth is that only about one percent of the land in the lower 48 states is designated as wilderness.

I hope you will consider designating more acreage for wilderness than is currently proposed. More than just the tops of the fourteen-thousand-foot peaks should be protected.

The San Juans in particular offer some of Colorado's most beautiful scenery. More of it deserves wilderness designation. Alternative I should be selected. Thank you.

CHAIRMAN REED: Thank you, Mr. Goss. The next person wishing to speak is Mary Gilbert.

MS. GILBERT: I am Mary Gilbert from Fort Collins, and I'm also a member of the Colorado Mountain Club.

I would like to recommend to the BLM to protect all of the Handies Peak area and all of the Redcloud area including Grizzly and Silver Creek and Alpine and Owl Gulches.

Why do you want to protect just the tops of mountains and not whole ecosystems? You need to protect the whole ecosystem, not fragments.

I have climbed Sunshine, Redcloud, and Handies Peak last summer. And it's one of the most stupendous vacations I have ever had. The views are just out of this world. I'm one of these people in the Colorado Mountain Club that literally likes to walk along the roof of Colorado. That is, I'm out to get all the fourteen-thousand-foot mountains in Colorado.

I would hate to see these areas around Sunshine, Redcloud and Handies be developed, because development will invariably lead to air pollution. And if air pollution ever exists in those areas and if I climb those mountain ever again, I would not see Uncompaghre Peak; I would not see Wetterhorn

Peak; Mount Snuffels will be absolutely obliterated from my view; San Luis Peak would not be seen. I wouldn't be able to see the magnificent Grenadier Peaks to the west. I just don't know what would happen if that area gets all polluted from any potential development.

I have a sticker on my car called "Native." I live in Colorado. Colorado is in my blood even though I lived my first 21 years in the shadow of the Empire State Building. I moved away from New Jersey for a good reason. I wanted to get away from development. I wanted to get away from the city.

I enjoy the scenery in Colorado. Let's keep it beautiful.

In 1893 a lady named Katharine Lee Bates walked up to the summit of Pike's Peak. That view inspired her to write "America the Beautiful." I think Katherine Lee Batea today, if she climbed that same mountain, would be absolutely galled at the pollution and the development and how big this country has grown.

Katherine Lee Bates is my ancestor. And I would be absolutely galled myself if those views from Sunshine, Redcloud, and Handies Peak were impaired by the fruits of short-term and also shortsighted economic gain.

In this world we also have at our disposal alternative ways to develop energy, nonrenewal fuel. We have that at our fingertips. Why not use it? Why cut up those

mountains for short-term economic gain? Thank you, very much.

CHAIRMAN REED: Thank you, Ms. Gilbert. The next person to testify is Carl Hinrichs.

MR. HINRICHS: My name is Carl Hinrichs. I'm a member of the Colorado Mountain Club. And in my 15 years of living out here in Colorado and climbing all over the state, I think the San Juans are probably the most beautiful part of the state.

I've done the fourteeners down there, oh, four or five times I guess. And it concerned me when I learned of the possibility that those areas of the fourteeners would be decreased in size that you're considering. And it disturbs me for two reasons.

One, it's such a beautiful area, and as people have mentioned, once you get on the peak I can see Wetterhorn and Uncompahgre and Rio Grande Pyramid, it's a sight that you will seldom see anywhere else in the state.

And it also concerns me that this beauty could be marred by possible mining and other development in the area. There's nothing more disturbing than to be hiking or back-packing in an area and suddenly come upon the sight and the sound and the smell of a deisel generator powering a rock core drilling crew. That happened to me several times in the peak so far.

The other thing that disturbs me is the encrouchment

on our mountain peaks. As I mentioned, why just protect the summits of these peaks? You need to protect the whole area. More and more of our mountains are being encrouched by mining interests or urban development or private industry of one kind or another. And I would hate to see that happen down there.

The mountain is there, but we need permission in order to cross the land to get to it. Thank you.

CHAIRMAN REED: Thank you, Mr. Hinrichs. The next person to testify is Rosalind McClellan.

MS. McCLELLAN: My name is Rosallnd McClellan, and I work with the Colorado Wilderness Network, and I'm a chair of Adopt a BLM Wilderness Committee. This is sponsored by the Colorado Wilderness Network, which is a coalition, a formal coalition of conservationist groups which have joined together periodically to work on wilderness issues.

In my statement I address the problems that I see with the manageability and economics and minerals potential arguments that you have in your Draft EIS. What I want to do is just address a couple of statements, since this is too long to read within five minutes.

The statement is frequently made throughout the DEIS that more exploration needs to be done to determine whether commercial quantities of minerals exist in the Gunnison Basin/Silverton American Flats WSAs. According to the final wilderness study policy a mineral survey will be

3

3

conducted by the Minerals Management Service on any WSAs recommended as suitable for wilderness designation before they go to Congress.

Since this survey should confirm more definitively than any existing data the presence or absence of large quantities of minerals in these areas, it would seem to represent a bias against wilderness to exclude those portions of the WSAs on the basis of minerals potential alone, rather than letting the areas be carried forward through the recommendation stage, so that their mineral potential can be better ascertained.

This is a little bit out of context.

On Page 37 it is stated that tourism is the number one source of income for the area generating $137,900 in 1980 alone for Redcloud Peak. Left open to mining, over a long-term period would witness a significant decline in recreational use rather than generating a predictable 8 percent increase per year in wilderness use. Therefore, a known growing source of income would be reduced in favor of a boom and bust speculative one. Mineral development could wait for years for the right market conditions to occur while these wilderness areas gradually become degraded beyond recall.

In none of its arguments does this Draft EIS justify the drastically reduced wilderness study area boundaries proposed in the preferred alternative, neither in

its minerals potential argument, its manageability arguments or its economic arguments.

Underlying all these issues is the question: At what level of scarcity does a resource such as wilderness become the province of the larger public to be preserved even if it requires adjustments in its traditional uses and users.

The notion of conservation has been applied to most other resources besides hard rock minerals -- oil, gas, air, and water. And it is only a matter of time until hard rock minerals fall under the same constraint, even if all public lands were opened up for mining.

Many new methods are being developed to lower national dependence on the types of minerals contained in the Gunnison Basin WSAs: recycling, substitution, synthetics, and improved ore recovery. There is no reason to destroy a resource which cannot be recovered and for which there is no substitute for a resource which will soon have viable alternatives.

Wilderness usage is one of the fast growing uses of public lands according to the Forest Service. Existing wilderness areas will reach peak capacity in about 25 years according to a study conducted by CSU Professor Richard Walsh.

Many wilderness areas have in places already lost their primary sense of solitude. Handies and Redcloud Peak

WSAs are needed in their entirety to help absorb the burden of this escalating wilderness usage and to ensure that the next generation can still find opportunities for solitude.

Redcloud and Handies Peaks could be mined in the next decades, their minerals and wilderness values both exhausted in the process, and the problem of supplying an energy hungry society would still remain. No amount of lab experimentation or recycling can replace a wilderness area once it's destroyed.

Since the need to confront the problems of mineral scarcity is coming soon anyway, I propose it be confronted now before another wilderness area is destroyed. I propose that the final Gunnison/American Flats Silverton EIS acknowledge the urgent necessity for preserving all of the area's WSAs and recommend them for wilderness designation with their full boundaries.

CHAIRMAN REED: Thank you, Ms. McClellan. The next person to testify is Marion Senior.

MS. SENIOR: My name is Marion Senior. I'm a member of the Colorado Mountain Club, and I want to thank you for holding these hearings here in Denver so we have an opportunity to testify. And I also want to go on record as supporting the recommendations that have been endorsed by the Colorado Mountain Club for these areas which will be clarified.

I've been in these areas. I've climbed Sunshine,

Redcloud, Handies, Uncompaghre, Sneffles, Windom, many of the peaks down there within the past few years. So you see you don't have to be a young, technical climber to get out and enjoy these areas. Many people can do it.

And I would like to just touch briefly on three specific points.

The first is the issue of what I call multiple-use, which I know is anathema to some environmental activists, but I'm not using it in the same sense. I'm talking about the kind of use that is possible when the land is open to the public as opposed to a single use when it's owned by private interests. When, for instance, a beautiful scenic canyon is shut off because it's being used for a water storage facility or when a large drainage basin is closed off because it's being turned into an open pit mine or perhaps even a beautiful recreation area has been bought up by a group and it's now used only by its own membership.

And we in the Mountain Club are finding more and more areas are closed off to us as more and more private interests come in and buy up and close off these areas so that we no longer have multiple-use; we have private individual use in more and more of Colorado. And, in fact, it's getting almost to the point now where if you want to enjoy a rural kind of experience you have to go out and buy your own land.

The second point that I'd like to touch on briefly

is diversification. And I think that one of the reasons -- I happen to work for the Department of Labor, so I'm familiar with unemployment problems -- one of the reasons we're not having as many problems as some of the other states is because we do have a diversified economy. We haven't put all of our resources and all of our efforts into one single industry. And I think that if we decide that we're going to concentrate on developing every mineral potential in this state and we concentrate on one industry, then we're going to experience the same kind of boom and bust, which was mentioned here earlier, that goes along with an economy that is not diversified.

And we have to recognize that tourism also brings in a lot of money.

The third thing -- well, also in connection with the second thing, I think that we cannot take areas and set them aside with the expectation that maybe fifty or a hundred years from now there will be some minerals in there that might be economical feasible, because in the meantime we're going to lose them.

And very briefly the third thing I wanted to bring up was in a way I want to apologize for all the people who aren't here tonight who ought to have been. I think that if every person in Colorado was given an opportunity to vote on what would happen with our remaining wild, scenic areas, that probably more than 90 percent would vote in favor of protection.

I wish that more of those people were here speaking tonight. But I understand that there's a lot of apathy and in some cases there's a lot of feeling of "What's the use?" "It isn't going to help me any."

The San Juans -- what a magnificent area. The people who named them must have been truly inspired because they named them for a saint. And I think that for future generations we want to protect these areas so that they will be a source of recreation and of inspiration. Thank you.

CHAIRMAN REED: Thank you, Ms. Senior. The next person to testify is Kim McLacklin.

MR. McLACKLIN: My name is Kim McLacklin, and I'm from Fort Collins, Colorado.

My wife and I have had the very good fortune of being able to enjoy some of our country's most wild and scenic areas including the San Juans of southwestern Colorado. And in our estimation the San Juans are second to none in their scenic beauty and provide bountiful opportunities for individuals seeking the joy of the wilderness experience.

The current acreage recommended for wilderness by the BLM will protect the summits of Handies, Redcloud and Sunshine Peaks while leaving many acres of land suitable for wilderness designation to be economically exploited.

Wilderness is not something that can be restored once it is gone, and I feel this generation has the last

opportunity, if not the responsibility, to preserve as much of our natural heritage as we possibly can. What greater legacy could we leave your children and children's children than to leave the land as beautiful and as uncluttered as the first human being found it? In light of what I've just said, I would urge the BLM to adopt the all wilderness alternative.

CHAIRMAN REED: The next person to testify is Roger Fuehrer.

MR. FUEHRER: My name is Roger Fuehrer, and I'm an ardent fan of the outdoors plus I own two small businesses and I have investments in oil and gas and mining developments. And I would like to speak to both development and to preservation of scenic beauty.

I have read several BLM pamphlets that have indicated how proud the BLM is that it has at least three fourteen-thousand-foot peaks in its lands. And I cannot understand that if this is really their feelings why they would want to go ahead and make proposals that would really diminish the effect and the preservation of these three fourteen-thousand-foot peaks plus the surrounding area.

The boundaries that are drawn on the maps and the current proposals indicate that much of the area would be around timberline and above. Really, nothing is as good as its foundation, and if you are allowing the foundation of these beautiful peaks to be exploited or developed, then what

you really are saying is "We're really not proud of having these fourteen-thousand-foot peaks in our land."

So I would recommend that if you want to continue the alternative as you have it that you change all of your publications about how fine a system you have in the state of having three fourteen-thousand-foot peaks in your land.

Also in the last two years, I have made numerous adventures down into the area and I'd like to point some out. I have gone up Bent Creek up to the area that has been eliminated on the east side of Redcloud Peak all the way through Red and Grassy Mountains. There are literally hundreds of mining claims there. Most of these claims have been there, literally, for about a hundred years. Most of them are certainly not new.

If these really had economic potential, I am convinced that they would have been developed by this time. There is no reason that I can see to have most of the area all the way from the Redcloud Peak along the grassy ridges clear to Red Mountain eliminated.

Also the areas in Alpine Gulch which I have understood that have been eliminated in the northern section of this area because of a prospective alumite mine -- is that it? -- I cannot understand why this area would be left aside especially when in my travels in the business big corporations like Anaconda are closing down their mining operations because

of lack of demand.

On the Handies Peak side the entire area south of Cottonwood Gulch, I spent three days going up Cataract Gulch last year up into Cataract Lakes. This area has been completely eliminated. There is not, that I can see from any of your maps, any mining claims. Perhaps the reason you've eliminated this is because it seems like it would be an isolated section. I would like to point out that this is adjacent to a magnificent area with granite walls of two to three thousand feet high. There is no way it could be economically exploited. And it's adjacent to a wilderness study area of the Forest Service. I would highly recommend that this area be placed back into the proposal.

Have a lot of friends who are in the ore mining business, I feel strongly that we do need development. But it doesn't take anybody of any great educational ability to go down to the area and see that its priority really is scenic, non-motorized, recreational use. And if it comes a time in our country when we really do need these minerals, when we really do need the alumite, which we do need any potential oil and gas down there, I would recommend at that time we look at the situation again. Until that time I would hope that you would go back to the original wilderness study area boundaries and preserve this area for its natural priority use, which is all wilderness. Thank you.

CHAIRMAN REED: Thank you, Mr. Fuehrer. The next person wishing to testify is Ron Sinton.

MR. SINTON: I'm Ron Sinton, and I'm speaking just for myself. I've spent time backpacking in three of the WSAs: Redcloud, Handies, and American Flats. So I'll focus on those areas.

The Handies and Redcloud so-called preferred alternatives are too small to protect the areas, both of which deserve wilderness designation.

The Redcloud area boundary conflict resolution II has been drawn more or less at timberline. This doesn't even protect the tops of Redcloud and Sunshine from the possibility of distracting sights and sounds at close range.

I agree with the EIS statement that the alternative does not adequately represent ecologic boundaries associated with wildlife habitat, migration, and wilflife use. It doesn't represent esthetic boundaries either.

A better alternative would be the manageability alternative.

I think the preferred alternative for Handies Peak suffers from the same problems. It's too small and excludes some of the nicest sections of the WSA. The entire WSA deserves designation.

I would like to see a maximum designation for both of these areas and would feel very disappointed if the

over-compromised present preferred alternatives were not enlarged in the final recommendation.

The other area I've been in ia the American Flats. I was very impressed with the spacious tundra with spectacular views. I think that it would make a nice addition to Big Blue.

More generally, the San Juana are perhapa the moat beautiful area in the state. I favor maximum deaignation of the wilderness in this area, both the contiguous areas as well as those I have mentioned.

CHAIRMAN REED: Thank you, Mr. Sinton. The next person to testify is David Kopec.

MR. KOPEC: Thank you, Mr. Reed. I'm an engineer, and thia ia the first time I've ever spoken in front of a crowd like this as far as conservation issues, but I heard the San Juans were up for reclaasification. I grew a little excited about it. My wife can testify that normally I'm a pretty logical person, but I get a little excited when I hear that our wilderness is being encrouched upon.

I guess my whole point in this is I've heard a lot of good arguments on both sides, and I can appreciate the statistics that the oil companies and the exploration companies have given and also the wilderness side of it.

I think the key issue with me is that once something like this ia lost, we can't recover it again. And just for

that reason alone I would recommend the maximum wilderness alternative just to keep it. Things may change later on, but at least for now we could certainly keep it. And I can't really see the point where we need all these explorations to atart right now.

I hear aome of the comments also that I have not seen many mining claims, at least not any active onea where I've climbed, and I've climbed all three peaks there, and I love the area.

One last comment, aa I was coming over here tonight I thought about my three boys. And I kind of really got a wierd twinge in my atomach when I thought that what would happen if I didn't speak out tonight and didn't say anything, and one of them came up to me a couple of years from now and aaid, "Hey, Dad, what happened to the wilderneas area there? How come you didn't do aomething?"

Well, I've apoken tonight.

CHAIRMAN REED: Thank you. The next peraon wiahing to teatify is Mark Udall.

MR. UDALL: Good evening. I too appreciate the opportunity to testify tonight and the fact that BLM has come to Denver to hear aome of us urbanites say our piece.

My name is Mark Udall. I'm the program director at the Colorado Outward Bound School. And I'm here tonight to testify on behalf of the Colorado Outward Bound School, which

ia affectionately known as COBS. So if I fall into calling it COBS, you'll know what I'm talking about.

Before I begin to comment on the BLM's recommendations for the Gunnison Basin area I juat would like to tell you a little bit about the Outward Bound School. I think it would help you understand our position.

We're a private nonprofit educational institution that offers wilderness based, experiential educatlon programs to the general public. COBS has been in exiatence aince 1961, and as of 1982 over 30,000 people of all ages, nationalities, and backgrounds have completed one of our coursea.

Our programs are designed for and offered to many groups of people -- adults over 30, high achool atudents in outdoor programs, alcoholica, corporate executives, disabled adults, and adjudicated youth.

The mainstay of our school, the 23-day standard course, is offered to anyone over 16-1/2 in good phyaical and mental condition. Courses operate every month of the year in the mountaina and canyons of Colorado and Utah.

At thia point I'd like to make some specific comments about the San Juans and the BLM'a wilderness proposals.

COBS has run 23-day courses in the San Juans since the mid-60s, both the winter and the summer. During theae coursea our atudents have made numerous ascents of Handiea, Redcloud, and Sunshine Peaks. They have hiked and navigated

in the American Flats area, Needle Creek, Whitehead Gulch, and Wemlnuche Contiguous areas during their educational journeys. Above all for the last 15 years our atudenta have learned valuable and lasting leasons about themaelvea, about other people, and about the land during their travela in this unigue and priatine area.

I'm here tonight because I want future Outward Bound students to have the opportunity to visit these areas and see them in the aame condition that they're in now.

We now have the chance to preserve them forever as wilderness. However, the BLM's recommendationa fall ahort of providing adeguate protection to the north San Juans.

Specifically we would like to make the following comments:

We recommend that the Handies WSA, the first alternative as recommended by the Bureau of Land Management.

We recommend Alternative III for the Redcloud Peak area as recommended by the BLM.

For American Flata we support Alternative I. We feel that all the American Flata area should be recommended as wilderness.

For the Needle Creek area we also support the all wilderness designatlon for this area. It's a natural addition to an existing wilderness area.

Whitehead Gulch, we aupport Alternative III, and

would hope that Congress -- it's really out of hands at this point -- but that Congress would go ahead and come through with this land exchange which would compensate the state for land they own in that particular area.

Weminuche Contiguous is also a natural addition to an existing wilderness area. We feel that the all wilderness option should be adopted by the BLM.

The Bill Hare Gulch and Larson Creek, both of these areas we support Alternative III, manageability option.

In conclusion, I would like to briefly discuss what the BLM has identified as a major area of conflict -- the development of mineral resources versus the protection of wilderness resources.

It is important to recognize that much of the area around these WSAs has already been developed for mineral resources. One only has to look to the area to the north and east of Silverton, this area all in here (indicating), on both Forest Service and BLM land to see the incredible amount of mining activity that's going on in those areas for the last hundred years.

It's been pointed out many times before that the potential of wilderness is unlimited. By potential I mean spiritual, educational, and economic. I say economic because I think more and more people are beginning to recognize the economic values of wilderness are as great, probably greater,

than the mineral economic values.

By failing to recommend as much wilderness as possible in these areas, BLM will be setting a bad precedent for future BLM wilderness study recommendations and, even more important, we will have squandered a valuable opportunity to preserve a small, unique part of our quickly shrinking wild landscape. Thank you.

CHAIRMAN REED: The next person to testify is Chris Citnon.

MS. CITNON: My name is Chris Citnon. I live nearby in Denver. I came tonight on my bicycle in the rain without dinner and waited two hours because I'm so dismayed by this proposal. I urge that the entire area be designated wilderness.

I think this proposal is a travesty, and I'm sick of our federal government giving away our land. I'm a lawyer, and I think it's a trust. And I don't think that that's right that they should give away our land.

I also thought we would have, by 1982, learned a few lessons of history that giving away these things, we can't get it back. I went down there for the first time last July 4th with one of the speakers tonight actually. I didn't know he was here.

It was my first hike with the Colorado Mountain Club. And it's a spectacular area. I don't see how you can protect

the top without protecting the bottom. I came to defend the valleys because I climbed Handies and I was very impressed, but I'm a pretty novice climber. I didn't make it up the other two. And I preferred, frankly, to hang around and explore all around and in between.

I, unlike some other people, don't get as excited about the peaks. I think it's wonderful, but I get pretty excited about all those valleys and lakes and streams.

Finally, I just think it's irreversable what you're doing, and we won't be able to get it back. So I hope you will reconsider.

CHAIRMAN REED: The next person wishing to testify is Geotti Tischbein.

(Pause.)

CHAIRMAN REED: He had to leave. Is there somebody else who would like to testify?

MR. ZELYMEN: I'm Bernard Zelymen. The question we we have tonight is what is the best use of these lands, and I'd like to talk about Redcloud and Handies because those are the areas I've been to and I know what their values are.

We heard about the national need for minerals. I don't doubt that we need minerals. I'm not against development. There's another need, and the resource of wilderness, a place for outdoor recreation is vanishing at a tremendous rate. Perhaps the Draft EIS is exploding, a five-fold projected

increase in the next 20 years.

I know that most of the BLM land that was initially considered for wilderness has been rejected already and only about 10 percent or less than 10 percent considered in the initial inventory has already been -- can no longer be considered for wilderness.

We're talking already about small acreage left of BLM lands in Colorado and elsewhere for possible wilderness classification.

So it seems to me that there's a tremendous need for wilderness in general for outdoor recreation, and the public has shown a tremendous demand. I see this in my trips every year. The small amount of land available to find this land now that the whole Handies area and the wilderness management alternative of Redcloud should be recommended for wilderness.

I've been up those peaks, and it just doesn't make sense to me. When I read the Draft EIS I was saddened, and most of all, I was angered. A peak is not a wilderness, and I would ask you to go back and recommend the full acerage for Handies and the wilderness management alternative for Redcloud.

CHAIRMAN REED: Thank you. Is John Fredrickson here? Would you like to testify?

MR. FREDRICKSON: My name is John Fredrickson. I'm a current chairman of a group of the Mountain Club, and I

think at last count we had 4,302 members. And I would just like to support the wilderness thing for wilderness boundary for Redcloud and the entire Handies. I've climbed all three of these peaks. I can't believe you'd leave the valleys out, the brooks, the streams, the beaver ponds, the trees. You've left everything out. I can't believe it.

I highly encourage you to reconsider. Thank you.

CHAIRMAN REED: Anybody else who would like to testify?

MR. MULLEN: I just wanted to make an observation. People have talked about multiple use tonight, and I think most people from the mineral industry didn't know what it means. And one lady who testified in favor of the area seemed to confuse the issue a little bit.

Multiple uses are wildlife, recreation, timber, range, and watershed. And mining is not one of the multiple uses. It's a single use.

Also, wilderness is consistent for multiple use as defined by the law and provides for most of thoses uses except timbering.

So I'd just want to correct and say that wilderness is multiple use.

CHAIRMAN REED: Could we get your name, please?

MR. MULLEN: Mark Mullen.

CHAIRMAN REED: Anybody else?

MS. BAMBREY: My name is Lucy Bambrey, B-a-m-b-r-e-y. And I'm here -- I didn't mean to come up and speak, but I got pretty emotional here, and the mineral industry brought a lot of numbers and a lot of percentages tonight. And I only have two: This is Terra, 9, that's her number; Jimmy, 6, that's his number.

And they may need the nickel in 20 years or 30 years, but in my uneducated opinion, they need the opportunity to see this area in its pristine state more. Thank you.

CHAIRMAN REED: Did you want to testify?

MR. PALMER: My name is Ralph Palmer, and I'm just testifying for myself. However, I am a member of the Colorado Mountain Club.

A couple of years ago I went deer hunting up by Meeker and there were like ten fellows from Tennessee hunting. And their excitement was not the deer, but how to get past the guard and get on the BLM land. That was used for coal or whatever they're doing out there.

It was preposterous. There was no conflict apparent and the guys couldn't get on it just because somebody held the lease to it.

Like on wilderness, the minerals will always be available there. If no alternative to them develops and our country's welfare hinges on this particular mineral or whatever, like with our recent gasoline history, while it was

cheap manufacturers made cars that guzzled it up. We all had to drive them and did and blew it. We wasted all that gas. So now the cost increase, everybody became much more efficient and conservative-minded. So let's become efficient now with minerals before the last quantity has been consumed. Thank you.

CHAIRMAN REED: Thank you, Mr. Palmer. Is there anybody else who would like to testify?

MR. ANDERST: My name is Darrel Anderst. I'm a member of the Sierra Club, and I had no prepared statement for tonight because I have gotten into this very late. This is the first opportunity I've had to have any contact with this proposal.

But I would like to make a statement about the cosmic picture that we're looking at in our world. I've been recently reading a book by Jeremy Rifkin called "Entropy." It's a detailed study of the second law of thermodynamics and the effect on our world. And he goes into detail about how we are exploiting our land, how we are -- there is a world view that it is acceptable to take public lands and to make them private, to just accumulate private lands so people can own land privately to the point where there is no land left for the general public. And also the fact that we're taking and exploiting the minerals, taking all of the things we have out of the land so that there's nothing left. And, as has been

pointed out before, it cannot be replaced.

And I would like to suggest or recommend that the BLM take into account what is going to happen to our world because it must conform to the second law of thermodynamics. There's no alternatives. And to look at what is going to happen to the land in Colorado down the line in the future, and the quality of life that we'll have 20, 30, 50, a hundred years from now.

Is it not a consideration to make that quality of life the best possible now because we aren't going to have it because we are going to use up all of the things that we have. Thank you.

CHAIRMAN REED: Thank you. Is there anybody else who would like to testify?

MS. SENIOR: My name is Joann Senior. I too don't have any statistics or whatever. I just want to express my feeling of outrage that this area would be considered for these uses. I just feel absolutely angered about it. And I would highly recommend that the whole area be made into wilderness. That's all I have to say.

CHAIRMAN REED: Thank you. Anybody else?

(No response.)

CHAIRMAN REED: If there's no one else to testify, we'll conclude these hearings. I'd like to thank all of you for coming, for testifying. And those of you who will be

submitting additional comments, those will also be considered if they're submitted before the 8th of July.

We appreciate your coming down. Thank you.

(The hearing was concluded at 9:15 p.m.)

* * * * *

REPORTER'S CERTIFICATE

I, Becky S. Jackson, Shorthand Reporter, being duly appointed to report the above-entitled matter, do hereby certify that the foregoing is a full, true, and accurate transcript of the shorthand notes taken by me covering the hearing of this cause at the time and place as hereinabove set forth, and that the same was reduced to typewritten form under my supervision.

Dated this 26th day of May, 1982.

Becky S. Jackson

Response to Denver Public Hearing Comments

1. See our previous response to the Silverton Hearing Comment Number 1.

2. As stated on pages 26 and 27 of the DEIS, the WSAs were classified in terms of a spectrum or continuum of available recreation opportunities (ROS). The definitions used in the naming of the ROS classes are not reflective of, nor are they synonomous with, the definitions of primitive or wilderness used in the Wilderness Act or FLMPA. The classifications merely depict relative types of experiences available to users, irrespective of any given WSAs suitability under Wilderness Act criteria. From an ROS perspective, what is important are the types of recreation experiences available in each ROS zone,not the name chosen to describe each. Various primitive types of recreation are known to exist in up to four of the six ROS classes.

3. A mineral report will be conducted by the U.S Geological Survey and U.S. Bureau of Mines on those lands found preliminary suitable for wilderness designation.

4. Those lands south of Cottonwood Creek were recommended nonsuitable because they could not be reasonably managed as wilderness when the adjacent National Forest lands were not. As discussed in response to the Silverton Hearing Comment Number 1, the opportunity to jointly study or recommend the BLM and Forest Service lands does not exist at this time.

1

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION (AFESC)
1114 COMMERCE STREET
DALLAS, TEXAS 75242

26 May 1982

RECEIVED
JUN 1'82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
P O Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson

Thank you for providing us the opportunity to review the draft environmental impact statement for the proposed Wilderness Study Areas in the Gunnison Basin and American Flats/Silverton Planning Units.

The Air Force concern on wilderness issues involves the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

1A Flight training areas, routes and airspace requirements of the military are subject to change and do change frequently. Mission requirements, fuel costs and environmental constraints determine the decision to locate a military training activity. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the Air Force. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace. Decisions to restrict military overflights will be opposed by the Air Force.

We hope this information is useful in your planning. If additional information is needed, our staff point of contact on wilderness is Mr. Raymond Bruntmyer, (214) 767-2514, or FTS 729-2514.

Sincerely

PAUL D. GARCIA, Major, USAF
Deputy Chief, Environmental Planning Division

Respoose to Comment Letter 1

1A The BLM will give consideration to low level high speed military flights during preperation of a wilderness manegement plan. Currently, BLM management policy does not restrict low level military flights.

2

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:

RECEIVED
JUN 23'82
B.L.M. Montrose Dist.

L7617 (RMR-PC)

JUN 18 1982

Memorandum

To: Mr. Henri Bisson, Project Manager, Montrose District, Bureau of Land Management, Montrose, Colorado

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of draft environmental impact statement (EIS) for proposed Gunnison Basin and the American Flats - Silverton Wilderness, Colorado (DES-82/12)

The National Park has reviewed the subject draft EIS and has the following comments.

General Comments:

The proposal would not directly affect any unit of the National Park System. Nevertheless, we support proposed additions to the National Wilderness Preservation System as enhancing management objectives of the National Park Service.

Specific Comments

Page 69, Item 4. We question whether using a very broad approach to

2A indicate that mitigating measures will be covered in a "Final Wilderness Policy" is acceptable under Council of Environmental Quality (CEQ) regulations. We find that the document goes to some length describing impacts, but that very little is said to identify mitigating measures. Examples of such measures might be monitoring use areas, and designating new use sites while old ones are being rehabilitated, and the means for such rehabilitation.

2B It is not clear whether cultural resource surveys have been completed on each of the study units. Executive Order 11593 places several requirements on Federal agencies to locate and preserve historic properties under their administration or control consistent with other program objectives. We recommend formal consultation with the Colorado State Historic Preservation Officer (SHPO) to determine if any properties listed on or eligible for the National Register of Historic Places are located within any of the study areas. In addition, you should obtain his opinion on the adequacy of present knowledge of cultural resources in the study areas.

Year of the Visitor

2

2

2B If he indicates that surveys are needed, they should be undertaken prior to any final selection of alternatives presented in the draft environmental impact statement. The final environmental impact statement should include survey results and document BLM's consultation with the SHPO. The SHPO for Colorado is Mr. Arthur C. Townsend, Colorado Heritage Center, 1300 Broadway, Denver, Colorado 80203.

The Slumgullion Earthflow National Natural Landmark, Norseshoe Basin Potential National Natural Landmark, the Durango-Silverton Railroad Potential Historic Landmark, and the Silverton National Historic District are partially or totally located within several of the study areas. These areas have been so designated because of their outstanding natural or historic features. While they have no statutory protection, we believe that wilderness designation would be beneficial in preserving their natural and historic qualities.

2C The Animas River from Animas City to Mineral Creek has been included in the final list of the Nationwide Rivers Inventory. Rivers which have been included on this list have been selected after consideration of the degree to which the river is free-flowing, the degree to which the river and corridor are undeveloped, and the outstanding natural and cultural characteristics of the river and its immediate environment. Wilderness designation for the Needle Creek Study Unit would be helpful in preserving those qualities for which the Animas River was selected for the Nationwide Rivers Inventory final list.

In view of the outstanding recreation opportunities and visual qualities which are present in all of the study areas, we are concerned that the preferred alternatives for the Redcloud Peak, Handies Peak, American Flats, Weminuche Contiguous, and Whitehead Gulch Study Areas would result in significantly reduced acreages from the original study areas, and therefore reduced recreation opportunities as noted in Appendix 4.5 and Chapter 4. The summary states that, for these five areas, non-wilderness management could affect wilderness values. Therefore, a prudent course of action for the preservation of wilderness values would seem to be implementation of the all-wilderness alternative for each of these study areas.

Similarly, the preferred alternative for the Bill Nare Gulch and Larson Creek study areas would totally preclude wilderness designation, even though both are contiguous to an already designated wilderness area. The summary states that no significant resource values would be foregone with either wilderness or non-wilderness designation. Given this situation, we recommend that BLM reconsider its preferred non-wilderness alternatives for these two study areas and consider adding them to the Big Blue Wilderness Area.

2

3

Summary Comments

The final EIS needs to point out more specifically what mitigating measures might be taken for perceived impacts from wilderness or non-wilderness designation. The EIS also needs to identify the indirect effects that wilderness designation would have on natural and historic landmarks and on the free-flowing Animas River.

Richard A. Strait

Response to Comment Letter 2

2A The actual mitigating measures to be used in management of a wilderness areas will be developed through a wilderness management plan. Conversely, mitigation for possible mining activity cannot be addressed unless a specific proposal is received from a mining concern.

2B Class I (literature searches) inventories have been conducted on the study units and no sites eligible or listed on the National Register of Historic Places are in the study units.

Inventory procedure is well-established and is done whenever surface disturbance occurs in a non-inventoried area. Mitigation for site loss or damage is normally done when a site qualifies for inclusion in the National Register of Historic Places. Generally, wilderness designation is not adverse to cultural resources because they will generally benefit from an area being designated as wilderness. Except for valid existing rights, such designation legally precludes development, land disturbances, motorized use, and other damaging or intrusive human effects. Most wilderness users tend to be sensitive to their environment and thus are far less likely to "pothunt" than others. If an area is not designated wilderness, it may be opened to development such as oil and gas, roads, timber sales, and other surface disturbing activities. Such disturbances may cause destruction to significant cultural resources and can open regions without previous access. Increased access can provide vandals and "pothunters" easy ability to loot and the damage to cultural resources can increase greatly. It should be noted, however, that most all development on the public lands requires inventory and mitigation for cultural resources, thus providing legal protection which occurs whether an area is designated as wilderness or not.

At the time a wilderness management plan is developed, procedures for the identification and protection of cultural resources will be considered as part of that process. This will include inventory, when appropriate, mitigation as needed, and consultation with the State Historic Preservation Officer as required under 36 CFR 800.4.

The Colorado State Historic Preservation Office was contacted and his comments and BLM's response to his comments are included in this document.

2C Wilderness designation of the Needle Creek and Whitehead Gulch WSAs (previously considered in this EIS) as well as the West Needles Contiguous WSA addressed in separate BLM/FS joint EIS, would protect this segment of the Animas River. This will be addressed in those separate EIS's which now address these WSAs.

3

United States Department of Agriculture — Forest Service

Grand Mesa, Uncompahgre and Gunnison N.F.
2250 Hwy 50, Delta, CO 81416

Reply to: 1530
1950

Date: July 2, 1982

RECEIVED
JUL 7'82
B.L.M. Montrose Dist.

Mr. Henri Bleson
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Dear Henri:

We have reviewed the Draft Environmental Impact Statement for the "Proposed Wilderness Designation of the Wilderness Study Areas within the Gunnison Basin and American Flats/Silverton Planning Units of the Montrose District, Colorado". We agree with your chosen preferred alternatives for the areas adjacent to this Forest (American Flats, Bill Hare and Larsah Creek WSA's). Existing recently established wilderness acreages have been finalized since you were supplied with figures for them. Enclosed is a list of all Wilderness with the correct acreage noted also. Some of these acreages are slightly different from those shown in the DEIS.

Sincerely,

JIMMY R. WILKINS
Forest Supervisor

Enclosure

FS-6200-11(8-80)

3

Forest Service — COLORADO

WILDERNESS - STUDY - PLANNING AREAS

U.S. Department of Agriculture -- Rocky Mountain Region

WILDERNESS AREAS National Wilderness Preservation System Units Administered Under Code of Federal Regulations Title 36, Section 293.1 through 293.15.

Administered by USDA, FOREST SERVICE

Name of Area	National Forest	Gross Acres	Net Acres	Law and Date Established
Big Blue	Uncompahgre	97,700	97,350	P.L. 96-560, 12/22/80
Cache La Poudre	Roosevelt	9,600	9,400	P.L. 96-560, 12/22/80
Collegiate Peaks	Gunnison	48,000	48,000	P.L. 96-560, 12/22/80
	San Isabel	81,450	81,450	
	White River	30,450	30,450	
	Total	159,900	159,900	
Comanche Peak	Roosevelt	67,500	67,500	P.L. 96-560, 12/22/80
Eagles Nest	Arapaho	82,810	82,743	P.L. 940-352, 7/12/76
	White River	51,105	50,945	
	Total	133,915	133,688	
Flat Tops	Routt	38,870	38,870	P.L. 94-146, 12/15/75
	White River	196,360	196,165	
	Total	235,230	235,035	
Holy Cross	San Isabel	9,020	8,960	P.L. 96-560, 12/22/80
	White River	107,850	107,100	
	Total	116,870	116,060	
Hunter-Fryingpan	White River	76,450	76,250	P.L. 95-237, 2/24/78
Indian Peaks	Arapaho	60,180	60,109	P.L. 95-450, 10/11/78 &
	Roosevelt	30,714	30,265	P.L. 96-560, 12/22/80
	Total	90,894	90,374	
La Garita	Gunnison	77,122	77,122	P.L. 88-577, 9/3/64 &
	Rio Grande	24,164	24,164	P.L. 96-560, 12/22/80
	Total	101,286	101,286	
Lizard Head	San Juan	20,939	20,816	P.L. 96-560, 12/22/80
	Uncompahgre	20,557	20,342	
	Total	41,496	41,158	
Lost Creek	Pike	106,000	105,680	P.L. 96-560, 12/22/80
Maroon Bells-Snowmass	Gunnison	19,850	19,000	P.L. 88-577, 9/3/64 &
	White River	154,579	153,560	P.L. 96-560, 12/22/80
	Total	174,429	172,560	
Mt. Evans	Arapaho	37,850	37,850	P.L. 96-560, 12/22/80
	Pike	35,150	35,150	
	Total	73,000	73,000	
Mt. Massive	San Isabel	26,000	26,000	P.L. 96-560, 12/22/80
Mt. Sneffels	Uncompahgre	16,200	16,200	P.L. 96-560, 12/22/80
Mt. Zirkel	Routt	139,698	139,818	P.L. 88-577, 9/3/64 & P.L. 96-560, 12/22/80
Neota	Roosevelt	10,000	9,616	P.L. 96-560, 12/22/80
	Routt	220	220	
	Total	10,220	9,836	
Never Summer	Arapaho	7,441	7,043	P.L. 96-560, 12/22/80
	Routt	6,659	6,659	
	Total	14,100	13,702	

1-71-2-82 B

3

Name of Area	National Forest	Gross Acres	Net Acres	Law and Date Established
Raggeds	Gunnison	42,200	42,200	P.L. 96-560, 12/22/80
	White River	17,000	16,750	
	Total	59,200	58,950	
Rawah	Roosavelt	72,437	71,647	P.L. 96-560, 12/22/80 &
	Routt	1,462	1,462	P.L. 88-577, 9/3/64
	Total	73,899	73,109	
South San Juan	Rio Grande	87,847	87,847	P.L. 96-560, 12/22/80
	San Juan	39,874	39,874	
	Total	127,721	127,721	
Weminuche	Rio Granda	167,715	167,685	P.L. 93-632, 1/3/75 &
	San Juan	297,975	293,774	P.L. 96-560, 12/22/80
	Total	465,690	461,459	
West Elk	Gunnison	176,412	176,092	P.L. 88-577, 9/3/64 & P.L. 96-560, 12/22/80
Total USDA FOREST SERVICE		2,572,410	2,561,128	

Administered By NATIONAL PARK SERVICE

Name of Area	National Park or Monument	Net Acres	Law and Date Established
Black Canyon	Black Canyon NM	11,180	P.L. 94-567, 10/20/76
Great Sand Dunes	Great Sand Dunes NM	33,490	P.L. 94-567, 10/20/76
Indian Peaks	Rocky Mountain NP	2,917	P.L. 96-560, 12/22/80
Mesa Varde	Mesa Verde NP	8,100	P.L. 94-567, 10/20/76
Total NATIONAL PARK SERVICE		55,687	
TOTAL WILDERNESS AREAS IN COLORADO		2,616,815	

WILDERNESS STUDY AREAS The following congressionally designated wilderness study areas, except Spruce Creek, were designated by P.L. 96-560, 12/22/80. Spruce Creek was designated as a wilderness study area by P.L. 96-237, 2/24/78. Studies with recommendations will be submitted to Congress by December 1983.

Name of Area	National Forest(s)	Acres
Buffalo Peaks	San Isabel	56,950
Fossil Ridge	Gunnison	54,700
Graanhorn Mountain	San Isabel	22,330
Oh-Be-Joyful	Gunnison	5,500
Piedra	San Juan	41,500
Sangre de Cristo	Rio Grande and San Isabel	218,632
South San Juan Expansion	San Juan	32,800
Spanish Peaks	San Isabel	19,570
Spruce Creek	White River	8,000
Yasquez Peak	Arapaho	12,800
West Needle	San Juan	15,800
Wheeler Geologic	Rio Grande	11,390
TOTAL WILDERNESS STUDY AREAS		509,972

FURTHER PLANNING AREAS Further planning areas were administratively established during RARE II and remain in affect following the passage of P.L. 96-560, 12/22/80.

Name of Area	National Forest	Acres
Cannibal Plateau	Gunnison	31,990
Davis Peak	Routt	8,100
Lost Creek	Pika	23,000
Service Creek	Routt	39,860
St. Louis Peak	Routt	12,800
Williams Fork	Arapaho (Routt)	74,770
TOTAL FURTHER PLANNING AREAS		190,520

4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

RECEIVED
JUL 23 1982
Dist.

JUL 23 1982

Ref: 8PM-EA

Mr. Henri Bisson
Bureau of Land Management
P. O. Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson:

Based on EPA's system for evaluating environmental impact statement under its review, we have rated this EIS as LO-1. This means that we do not object to the proposed action.

Please contact Mike Gansecki of my staff (FTS 327-4831) for any further assistance you may require with these comments.

Sincerely,

Steven J. Durham
Regional Administrator

Enclosure

4

DETAILED COMMENTS OF THE ENVIRONMENTAL PROTECTION AGENCY
ON THE GUNNISON BASIN/AMERICAN FLATS-SILVERTON WILDERNESS
DRAFT ENVIRONMENTAL IMPACT STATEMENT

I. Identification of Criteria for Watershed and Water Quality Values for Wilderness Protection

4A

The Draft EIS discusses watershed impacts and water quality impacts resulting from wilderness designation and in a general way for mining impacts. We recommend that the following criterion be utilized in assisting on wilderness decisions:

> The presence of highly valuable public benefits dependent on relatively pristine environmental conditions. For water quality, these include fisheries habitat (especially endangered or threatened species), domestic water supplies, or designated or potential Wild and Scenic Rivers on the nationwide inventory list of the Heritage Conservation and Recreation Service.

The final EIS should contain a better description of how this criterion has been taken into account in the decisionmaking process.

2. Estimates of Water Quality Impact

4B

In the Environmental Consequences Section 4, there is a discussion of water resource and water quality impacts from wilderness designation. On page 70, for example, the estimate is made that if the Redcloud Peak study area is made into wilderness, "an increase in recreational use would result in heavy and frequent use of selected campsites... which could degrade the hydrologic conditions.... Further, concentrated recreation use has the potential to compact soils and reduce the vegetation cover by trampling, which results in increased surface runoff and sediment yields. Improper sanitation could result in water quality problems by introducing fecal bacteria into the surface water system."

This analysis is predicated upon the assumption on page 69, that "(i)f Handies Peak and Redcloud Peak areas are designated wilderness, recreation use will increase initially at a higher rate than the national level (10 percent yearly)." The EIS impact analysis is a comparative one, evaluating changes resulting from proposed alternatives as compared to the null alternative or no-action alternative situation.

Assuming that the 10% refers to the increase in recreation uses in the study areas beyond the national level, such an increase will only marginally affect management of existing wildernesses and other public lands. Using the figures given on page iii of the Summary as a base and using compound growth rates, Table I below shows the difference in the number of visitors with and without the 10% increase. In 1985, for example, the difference in visitors would be 680 persons, while in the year 2000, the difference would be 2000 persons.

4

TABLE I.

Year	No Handies/Redcloud Peak Wilderness	With Handies/ Redcloud Wilderness	Difference
1980	3489 persons	3489	0
1985	4930	5610	680
2000	15,800	17,800	2000

4B

We are not suggesting that these water quality issues are unimportant. However, the attribution of wilderness status to these areas would only slightly change the nature of the problem of increased visitor use. The water quality impacts cited above are already problems in some wilderness and other public land recreation areas across the nation. You should focus to a greater extent upon the potential problems of managing these additional wilderness areas in light of present water quality impacts or other problems in the San Juan area (to the extent they can be quantified). Some discussion of institutional problems such as manpower or budgetary resource limitations of both BLM and the Forest Service should be presented in the final EIS. The discussion of impacts from proposed wilderness in the final EIS should reflect this marginal effect of additional visitors.

3. Protection of Water Resources

The State of Colorado is in the process of developing an Abandoned Mine Land Reclamation Program under the Surface Mining Control and Recovery Act of 1977. This program, although intended to initially deal with abandoned coal mines posing safety, health or environmental risks from past coal mining, does have the provision to deal with abandoned hard-rock mines. Colorado has assigned a fairly high priority to correction of some hard-rock mining sites now in an abandoned state.

4C

A number of the highly mineralized areas covered with abandoned mines in this study area might contain promising candidates for such future mine land reclamation. This would seem to be especially true in light of the numerous stream water quality problems noted in this document as a result of mine drainage or metals (Owl Gulch, Alpine Gulch, Cooper Creek, p. 28, "other tributaries", p. 39, Henson Creek, p. 44, etc.) The Colorado State Department of Mine Land Reclamation should be consulted to determine whether any of the mines in the study areas are slated for possible future mine reclamation.

This could have some minor repercussion for wilderness classification. Were any areas to be classified wilderness that contained some correctable acid mine drainage or heavy metals problems, it might be difficult to develop

4

4C future corrective activities. On the other hand, areas that might not now be candidates for wilderness because of impaired stream quality might again become possible candidates if the abandoned mine problems can be corrected in a substantially unnoticeable way. The final EIS should contain a brief discussion to indicate whether reclamation of past mining activities could have any effect on this wilderness evaluation.

Response to Comment Letter 4

4A Several of the proposed wilderness areas presently exhibit high quality surface waters in addition to several streams polluted with heavy/toxic metals (a result of both natural and man-related processes).

A wilderness designation, resulting in the projected increase in recreational use, would result in some additional degradation of the area's surface waters. This would primarily be a result of an increase in sediment yields and biological pathogens. Because of the quick die-off rates of most biological pathogens and the expected small increase in sediment yields, these impacts would be of a very local significance. Therefore, if designated wilderness, the quality and quantity of water originating on these areas would be preserved for off-site (downstream) water uses (e.g., domestic, industrial, irrigation, etc.)

4B The discussions of water quality, impacts have been rewritten in the final EIS. Primarily these are addressed for Redcloud Peak, Handies Peak and American Flats. Impacts in the other WSAs from recreation or other activities were determined not to be issues.

4C There are several instances of toxic metal pollutions within the proposed wilderness areas, some of which are a result of abandoned hard rock mines. The Colorado Mined Land Reclamation Division has been contacted and there are no future plans by the State to correct any of these water quality problem areas. If and when the time comes where reclamation of these areas becomes feasible, wilderness designation would not necessarily preclude reclamation activities. However,the types of equipment and methods of reclamation will have some restrictions. In addition, any watershed restoration proposals need approval by the Director of BLM (see "Wilderness Management Policy, USDI-BLM, 1981, Chapter III, F. Water Resource Management, 1. Watershed Restoration). Copies of this document are available from BLM offices.

Water quality was not a factor in determining proposed wilderness areas. Therefore, the reclaiming of abandoned mines causing water quality problems will not add any additional land area into the proposed wilderness category.

4a

United States Department of the Interior

IN REPLY REFER TO:

FISH AND WILDLIFE SERVICE
ENDANGERED SPECIES OFFICE
551 25½ ROAD
INDEPENDENCE PLAZA
SUITE B-115
GRAND JUNCTION, COLORADO 81505
TELEPHONE: 303-241-0843

July 30, 1986

Route to: Initial
JUL 3 1986
Received
- Area Manager
- C. Support
- Range
- Staff Chief
- Recreation
- Forestry
- Lands
- Minerals
- Wildlife
- Full route

Mr. Terry A. Reed
Resource Area Manager
Bureau of Land Management
Gunnison Resource Area
216 North Colorado
Gunnison, Colorado 81230

Dear Mr. Reed:

This responds to your July 24, 1986 letter requesting our review of the Gunnison Basin and American Flat-Silverton Wilderness Draft EIS. No species federally proposed or listed as threatened or endangered occur in those areas proposed for wilderness designation.

We appreciate your interest in conserving threatened and endangered species.

Sincerely,

Robert E. Lenchman
Acting Project Leader

5

STATE OF COLORADO RICHARD D. LAMM, Governor
DEPARTMENT OF NATURAL RESOURCES
D. MONTE PASCOE, Executive Director
1313 Sherman St., Room 718, Denver, Colorado 80203 866-3311

Geological Survey
Board of Land Commissioners
Mined Land Reclamation
Division of Mines
Oil and Gas Conservation Commission
Division of Parks & Outdoor Recreation
Soil Conservation Board
Water Conservation Board
Division of Water Resources
Division of Wildlife

June 29, 1982

Mr. George C. Francis, State Director
Bureau of Land Management
U. S. Department of the Interior
1037 - 20th Street
Denver, Colorado 80215

Dear George,

Enclosed are the comments of state agencies regarding the BLM proposals for wilderness designations in the Gunnison Basin-American Flats area. There are a number of specific comments that I would appreciate your staff carefully reviewing. It is apparent there are important wilderness values and important mineral values in the areas under study. As is always the case, consideration must be given to both values and your proposals do a good job of this.

Sincerely,

D. MONTE PASCOE
Executive Director

DMP:car
Enclosures

6

COLORADO HISTORICAL SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

April 23, 1982

Pete Naseth
A-95 Clearinghouse
523 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203

RE: Gunnison Basin and the American Flats - Silverton Wilderness Draft Environmental Impact Statement(DEIS).

Dear Mr. Naseth:

The Bureau of Land Management has stated that there may be adverse impacts to cultural resources if the area described in the above EIS is given wilderness designation.

6A The Bureau of Land Management must identify those resources within the proposed wilderness area that are eligible to the National Register of Historic Places. The effects of the project, be they direct due to construction, etc. or indirect due to increased visitor use, etc. must also be identified. A determination of effect is then made for all eligible cultural resources. The above is done in consultation with this office.

If this office can be of further assistance, please contact the Compliance Division at 866-3392

Sincerely,

Arthur C. Townsend
State Historic Preservation Officer

ACT/WJC:ss

RECEIVED JUN 15 1982 DEPARTMENT OF NATURAL RESOURCES

RECEIVED APR 26 1982 DIVISION OF LOCAL GOVERNMENT

Response to Comment Letter 6

6A See our previous response to comment 2B.

7

STATE OF COLORADO

COLORADO WATER CONSERVATION BOARD
Department of Natural Resources
823 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203
Phone: (303) 866-3441

Richard D. Lamm
Governor

J. William McDonald
Director

David W. Walker
Deputy Director

M E M O R A N D U M

TO: Stephan O. Ellis
State Clearing House

FROM: E. I. Jencsok, P. E.
Chief, Hydrologic Investigation Section

DATE: May 19, 1982

SUBJECT: Draft Environmental Impact Statement
Gunnison Basin and American Flats/Silverton
Wilderness Study Areas

The Colorado Water Conservation Board has made a brief review of the subject draft EIS. Our comments are as follows:

7A - The report makes reference (page 24 - 25) to the Colorado River Compact and the obligation of the Upper Basin States with reference to water deliveries to the Lower Basin.

The data presented are not in compliance with Colorado's interpretation of the compacts. These statements are inappropriate for the DEIS and should be deleted.

7B - The DEIS does not make any reference to the impact that wilderness designation will have on water resource development. Analysis of those impacts should be included in the EIS.

EIJ:dm

ENVIMPST:jg/522

RECEIVED MAY 21 1982 Division of Local Government

Robert A. Jackson, Chairman • John R. Fetcher, Vice Chairman
C.M. Furneaux, Dale F. Grant, Richard W. Johnston, Jr. Frederick V. Krueger, David W. Robbins, Herbert H. Vandemoer

Response to Comment Letter 7

7A The Colorado River Compact has been deleted in the FEIS.

7B Wilderness designation could have some impact on water resource development (see: "Wilderness Management Policy" USDI-BLM 1981 - Chapter III, F. Water Resource Management; 2.b and 2.c, page 20). However, no proposed or potential developments exist within any of the WSAs and therefore no impact to water resource development is projected.

8

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM
Department of Natural Resources
1313 Sherman Street, Room 718
Denver, Colorado 80203

Phone (303) 839-3311

Richard D. Lamm
Governor

O. Monte Pascoe
Executive Director

Carol J. Pustmueller, Ph.D.
Program Director

MEMORANDUM

TO: Steve Ellis, State Clearinghouse

FROM: Carse Pustmueller, Ph.D., Director, Natural Areas Program

DATE: June 10, 1982

RE: Attached comments from CNAP.

Attached please find comments prepared by the staff of the Natural Heritage Inventory of the Colorado Natural Areas Program on the following project(s):

Gunnison Basin American Flats- Silverton Wilderness

RECEIVED
JUN 14 1982
Division of Local Government

8

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM
Department of Natural Resources

Natural Heritage Inventory
1550 Lincoln Street, Room 101
Denver, Colorado 80203
Phone (303) 866-3437

Richard D. Lamm
Governor

D. Monte Pascoe
Executive Director

Carol J. Pustmueller, Ph.D.
Program Director

MEMORANDUM

REPLY FOR
INVENTORY DATA REQUEST

TO: Carse Pustmueller DATE:
FROM: J. Scott Peterson, Botanist
Beth P. Lapin, Zoologist
William L. Baker, Plant Ecologist

Plant Communities (PC)
Aquatic Ecosystems (AQ)
Special Plants (SP)
Special Animals (SA)
Geologic Features (GF)

REQUEST NO. 104 PROJECT: Gunnison Basin American Falts - Silverton Wilderness

8A SP/PC: The List of Preparers (pg 120) contains no expertise in rare plant species or plant communities, nor does this document address either. Additionally, the Preparers did not contact us to obtain any Heritage data.

IN COOPERATION WITH

Response to Comment Letter 8

8A Ed Singleton, Range Conservationist, was responsible for the vegetation section which included "rare plant species or plant communities". A request was not made from CNAP because this information had been previously gathered in 1978-79 for the Gunnison Basin Range EIS.

9

STATE OF COLORADO
Richard D. Lamm, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
Jack R. Grieb, Director
6060 Broadway
Denver, Colorado 80216 (826-1192)

MEMORANDUM

TO: Steve Ellis
State Clearinghouse

FROM: Don Smith
Division of Wildlife

SUBJECT: Draft Environmental Impact Statement for the Proposed Wilderness Study Areas in the Gunnison Basin and American Flats/Silverton Planning Units

DATE: June 18, 1982

The Division of Wildlife has reviewed the subject document written by the Bureau of Land Management. In general, we support the prefarred alternatives recommanded by the BLM. However, we believe that the fish and wildlife resources in the Redcloud Peak Area would benefit from a larger wilderness designation. We also recommend that the BLM, in developing its policy on wilderness management, consider those guidelines adopted by the International Association of Fish and Wildlife Agencies in 1976.

9A The fish and wildlife resources are an important attribute of the wilderness study areas in question and deserve a thorough analysis. The draft report fails to do this. For instance, the inventory section (Chapter 3) does not provide an adequate description of the fish and wildlife resources present and in some cases, is entirely wrong. Many species exist here but few are discussed. Much more data is available and should be researched. The impact section (Chapter 4) does not define the specific impacts which each alternative would have on the fish and wildlife resources but deals in generalities. The amount of habitat which could be lost is known and could be used to compare alternatives. The time of year and amount of disturbance could be quantified and compared. The impact of an alternative in the Needle Creek Area should not be compared to the Redcloud Peak Area because the fish and wildlife resources and populations are different. Needle Creek should stand alone or could be compared to an area contiguous to the Weminuche Wilderness.

The tabular data is too general making it difficult to accurately compare alternatives. In some cases "Same as above" is used rather than defining

DEPARTMENT OF NATURAL RESOURCES, Monte Pascoe, Executive Director • WILDLIFE COMMISSION, Donald Fernandez, Chairman, James Smith, Vice Chairman • Richard Divelbiss, Secretary • Jean K. Tool, Member • James D. Kennedy, Member, Michael Higbee, Member • Sam Caudill, Member • Wilbur Reddish, Member

Steve Ellis
Page 2
June 18, 1982

9B the actual impact. The wildlife appendix should definitely be included because of its importance to this document. The report discusses so few wildlife species that a list is necessary.

Our specific comments are attached. We would be happy to assist.

sg

cc: DeWitt John
Bob Rosette
Jim Houston
Mike Zgainer
Phil Mason

9

SPECIFIC COMMENTS

	Page	Section	Comment
9C	14-21	Table 2-2	The wildlife column is too brief, too general and too repetitious. Be more specific. Why isn't the fishery resource considered here?
9D	25	Terr. Wldlf.	There is no wildlife appendix. A listing is imperative because so few species are described in this report. This section should list the most common species present. Colorado's endangered wildlife species should also be considered.
9E	30	Terr. Wldlf.	Include a list of the other common wildlife species found here.
		Aquatic Wldlf.	We have filed for water rights on Bent, Copper and Silver Creeks because of their fishery. Why isn't the fishery in Cooper Lake mentioned?
9F	39	Terr. Wldlf.	Add other wildlife species present.
		Aquatic Wldlf.	We have filed on Cataract Creek because of its fishery. Also Cottonwood Creek. Why isn't the fishery in Sloan Lake mentioned?
9G	44	Terr. Wldlf.	The paragraph on potential species is out of place. Be specific.
9H	47	Wild. Res.	Elk are also found in this area.
9I	51	Aquatic Wldlf.	Cite your reference. Actually a list of references should be appended.
9J	52	Aquatic Wldlf.	We have also filed on Larson Creek because of its fishery. Data is available.
9K	57	Terr. Wldlf.	The last sentence is out of place.
9L	60	Commodities	Describe other species actually present. Redcloud Peak?

9

9M	70	Via. Res.	The last paragraph belongs in the vegetation section.
9N	71	Lands	What is the impact of this alternative? Can lands be purchased?
	77	Terr. Wldlf.	Elk would also be adversely affected by this alternative.
	78	Res. Alt. 11	This description of the impact is a cop-out. Define the specific impacts of this alternative in detail for the reader.
	80	Wilderness Alt.	Define the degree of impact. How much aquatic habitat affected?
	81	Terr. Wldlf.	The Division of Wildlife should be involved in preparation of the wilderness management plan.
	82	No Wilderness Alt.	See comment for page 8D.
	84	Wilderness Mgmt. Alt.	See comment for page 78. This applies to the lead-in paragraphs on all the following alternatives in the chapter.
	86	All Wilderness Alt.	Should this be aquatic wildlife? If not, it does not agree with the statement below on terrestrial wildlife. To what degree would the resource be impacted?
	87	No Wilderness Alt.	See comment for page 86. The statement for terrestrial wildlife does not agree with the statement on wildlife under the wilderness resource section.
	9D	No Wilderness Alt.	State why there would be no impact. Also for Larson Creek under no wilderness, page 9i.
	1D2	Terr. Wldlf.	This statement disagrees with that in the wilderness resource section.
	1D3	Wilderness Mgmt. Alt.	Aquatic wildlife is missing.
	100-117	Table 4-1	The impacts on wildlife should be more specific. Specify how many acres of habitat would be affected and whether the disruption of populations would be minor or significant. Why isn't the aquatic resource evaluated?

9

9N	1D6	Res. 11	The impact of this alternative could be considerably greater than conflict resolution No. 1. Say so! State the degree of adverse impact on wildlife.
	115	Conflict Res.	See comment for page 1D6.
9O	Appendix 3.3		Identify which areas have been recommended for wilderness designation.

Reaponae to Comment Latter 9

9A In the final EIS fiah and wildlife data ie provided in Chapter 3 aa appropriate for the level of concern identified for each WSA. Impacts on fish and wildlife were determined not to be an issue for Bill Hare Gulch and Larson Creek, consequently no impact aaaeaaments are made in the EIS. Impact diacuaaions are made specific to the other three WSAa without trying to reference the impacts from one WSA to another.

9B Fiah and wildlife resource information ia provided at the ievei neceaaary to saaeaa the impacts of the propoaed action and aiternatives. A wildlife appendix would not provide any additional information neceaaary to the analysis and is therefore not felt to be neceaaary.

9C See Reaponae 9B.

9D Aa identified in the document, no threatened or endangered apeciea are known to exist in any of the WSAa. See Reaponae 9B and Comment letter 4a.

9E Summer temporariea hired during the field season of 1980 obaerved brook trout in the pool areas of Bent Creek. Riae obaervationa are a part of BLM extensive surveys. According to Bill Weiler of the DOW (Montroae Regional Office) his crews didn't find any fish when they ahocked the atream. However, he suapecta there are fish there although DOW haa no data to aupport this. Neither Silver Creek nor Cooper Creek (the lower portion) contain fisheries according to Weiler. Thia is supported by BLM inventory work conducted during 1980. The upper portion of Cooper Creek and Cooper Lake contain fisheries. Theae are cutthroat atocked annually by DOW. Therefore, the fiahery in Cooper Lake should have been mentioned and haa been corrected.

9F According to Bill Weiler of DOW there is no current exiating data on Cataract Creek. BLM extensive inventoriea reported that no fiah were obaerved in Cataract Creek. BLM conducted a review of DOW Inventory filea and found 1976 data which indicated that Cataract Creek ia an intermittent atream with no fiahery value. Sloan Lake is basically a brook trout fiahery that haa been atocked in the paat by DOW but was not atocked in 1982 accurding tn Dave Langlois (DOW).

9G Paragraph appeara tn be correctly placed.

9H This is probebly true at least on a caaual beaia and haa been corrected.

9I The information waa beaed primarily on inventory data gathered from DOW's Montroae Office.

9J This last aantence is in error. We do have data on this atream (Larson Creek). The GBRA - EIS atates that an unquantified populatlon of brook trout exiat and the aquatic/riparian habitat is in excellent condition.

9K Sentence appaars to be correctly placed.

9L Wildlife economic commoditiea waa included aa a part of recreation (i.e. hunting).

9M The last paragraph waa correctly placed.

9N Impacts related to landa have been rewritten in the Final EIS.

9O The moat appropriate deacription for this appendix would he "areaa that are underatudy." Only the Secretary of the Interior can "recommend" and haa not done ao at thia time. Thia haa been changed in the Finel EIS.

10

RICHARD D. LAMM
Governor

JERIS A. DANIELSON
State Engineer

OFFICE OF THE STATE ENGINEER
DIVISION OF WATER RESOURCES

1313 Sherman Street-Room 818
Denver, Colorado 80203
(303) 866-3581

June 15, 1982

RECEIVED
JUN 16 1982
Division of Local Government

TO: Pete Naseth, State Clearinghouse

FROM: Hal D. Simpson, Assistant State Engineer

SUBJECT: Draft Enironmental Impact State, Wilderness Study Area Within the Gunnison Basin and American Flat/Silverton Wilderness

This is to acknowledge receipt of the above referanced EIS. We are concarned about the impact that the dasignation of wilderness areas would have on water rights and conditional (undeveloped) water rights in the Colorado River basin. Waters derived from the wilderness study areas are part of the Colorado River drainage and are appropriated. Therefore, we favor the alternatives which will have the least impact on the drainage area. In order for this office to fully evaluate the effects of the various alternatives on water rights within Colorado, we would nead more details regarding the quantity of water that would be derived from each study area under each alternative.

10A It appears from the EIS that the legal environment within which water resources of Colorado are administered has been ovarlooked. We suggest that a short discussion of such should be included in the Water Resource section on page twenty-four (24) since the legal environment will be a force on tha davelopment of the area.

10B Another main concern regarding the designation of any area as a wilderness area is maintaining motorized access to existing and future reservoirs and irrigation ditch headgates. Tha motorized access is needad to these structures not only for maintenance purposes, but also for our Water Commissioners to maintain diversion records and our Dam Inspectors to evaluate the safety of dams. Therefore, it is mandatory that motorized access to the structures be allowed. In the areas under study, this does not appear to be a major concern.

HDS/JPH:pkr

RECEIVED
JUN 1 1982
Division of Local Government

Response to Comment Letter 10

10A Wilderneaa deaignation ia not expected to have a aignificant effect on aoy existing water rights in any of the wilderneaa study areaa (WSAa). Both the Wilderneaa Act and Bureau of Land Management (BLM) Wiiderneaa Management Policy recognize vaiid existing rights. In the case of water rights, if any reaerved water rights are determined to be eatabliahed by the act of deaignation, the priority date of that right would be juoior to all rights existing at the time of deaignation. It would therefore not pre-empt any existing water rights. Furthermore, maintenance of existing water control structures that exiated under vaiid permits or other authority prior to deaignation could continue.

An isaue that has been recently raised is whether there would be an impact of a reserved wilderneaa water right on the transfer of exiating rights within the atream ayatem or through a transbesin diversion. Tranafers from above or within a wilderneaa area to below the wilderneaa would clearly not be affected since no leaa water would be allowed to flow through the wilderneaa. Only where transfers could result in the movement of rights from below to within or above the wilderneaa is there a potential effect. No auch transfers are currently known to be proposed within any of the WSAa. Even if at some future date, such a transfer is proposed, the effects are likely to be minimal if any. Limitations that would be placed on such e transfer because of wilderneaa would almoat certainly be no more aignificant than those which would be automatically imposed by other water rights more aenior than any reaerved wilderneaa water right. Even in the unlikaly evant that this ware not the case, it is probeble that flexibility could be provided to the water right holder while atill aasuring complete protection of the apecific wilderneaa valuea aasociated with water flows through the WSA. Mitigetions, flow augmentation meaaurea, water right exchangea, purchaaea or donationa and other legal avenuaa could provide the meana to accompliah thia.

10B Our records indicate no planned or exiating dama, reservoire, or diversion atructurea within theae WSAa. Motorized accese is thua presently not an issua.

11

STATE OF COLORADO

RICHARD D. LAMM
GOVERNOR

JOHN W. ROLD
DIRECTOR

COLORADO GEOLOGICAL SURVEY
DEPARTMENT OF NATURAL RESOURCES
715 STATE CENTENNIAL BUILDING — 1313 SHERMAN STREET
DENVER, COLORADO 80203 PHONE (303) 866-2611

MEMORANDUM

TO: Stephen O. Ellis, State Clearinghouse

FROM: A. L. Hornbaker, Colorado Geological Survey

DATE: June 18, 1982

RE: Gunnison Basin & the American Flats - Silverton Wilderness EIS 82-108

Appendix 3.8, in conjunction with the production figures as reported on page 26 taken from USGS MR-58, provides an insight on the importance of the areas for significant mineral potential, especially of the metallics. The areas offering the most potential are Redcloud Peaks CO-030-208, Handies Peak CO-030-241, American Flat CO-030-217, Weminuche Contiguous CO-030-2388, and Whitehead Gulch CO-030-2308.

When considering the dependence of the U.S. on imports for large percentages of our important metals and alloying metals, any large, potentially important mineral resource area that could supply significant amounts of these raw materials should be open to exploration and development. The areas above offer that kind of potential. Our recommendation, therefore, is for no-wilderness alternative of the areas listed above.

A. L. H.

bn

RECEIVED
JUN 18 1982
Division of Local Government

RECEIVED
JUN 23 1982

GEOLOGY
STORY OF THE PAST...KEY TO THE FUTURE

12

COLORADO DEPARTMENT OF HEALTH

DATE: June 16, 1982

SUBJECT: NON-STATE ASSISTANCE
REVIEW AND COMMENTS

RECEIVED
JUN 18 '82
B.L.M. Montrose Dist.

TO: Henri Bisson
Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

PROJECT TITLE: Gunnison Basin and the American Flats-Silverton Wilderness
DRAFT EIS, BLM
STATE IDENTIFIER: #82-108
COMMENTS DUE BY: June 14, 1982

COMMENTS: See attached comments.

for/ Paul A. Nagy
Name, Title
Thomas P. Looby
Environmental Programs Administrator

SCC-3, Jan 81

12

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Richard D. Lamm
Governor

Frank A. Traylor, M.D.
Executive Director

DATE: June 4, 1982

SUBJECT: NON-STATE ASSISTANCE
REVIEW AND COMMENTS

TO: Tom Looby

PROJECT TITLE: Gunnison Basin and the American Flats-Silverton Wilderness
DRAFT EIS, BLM

STATE IDENTIFIER: #82-108

COMMENTS DUE BY: June 14, 1982

COMMENTS: WATER QUALITY CONTROL DIVISION

The Water Quality Control Division has reviewed the above-named Draft Environmental Impact Statement. The Division has no objections or concerns with respect to the proposed action. The designation of wilderness areas is consistent with the Division's goal of protecting, maintaining, and improving the quality of the State's surface and ground waters. The recommendation not to designate other areas is not, in itself inconsistent with that goal. Proposals to undertake specific activities within non-wilderness areas must be evaluated individually to determine potential impacts on water quality.

The Division appreciates the opportunity to review this document and to have met with BLM personnel to discuss the study and its results.

TLB:erz

Comments prepared by: Tom Looby
Name, Title

4210 EAST 11TH AVENUE DENVER,COLORADO 80220 PHONE (303) 320-8333

13

HINSDALE COUNTY
"THE COUNTY OF LAKES"
Lake City, Colorado 81235

BUREAU OF LAND MANAGEMENT
COLO STATE OFFICE

'82 JUN -7 AM 8:00

June 3, 1982

Mr. George C. Francis, State Director
Bureau of Land Management
Colorado State Office
1037 20th Street
Denver, Colorado 80202

REF: Proposed Gunnison Basin and American Flats-Silverton Wilderness

Dear Mr. Francis:

In regard to the above referenced wilderness proposal, I would like to present the following information for your consideration:

The total area of Hinsdale County, Colorado, is only 685,200 acres; of this total, the Congress of the United States has already designated 302,795 acres as either primitive or wilderness areas.

This represents more than 44% of the total land area of this county.

In addition, of the remaining 56% of the county, 52% is owned by governmental entities and only 4% of the total land in this county is in private ownership.

As anyone can plainly see, the disproportionate government land ownership here imposes a constant economic stranglehold on the citizenry of this county. To take any(more) land out of multiple-use and turn it into wilderness would only hasten the economic death of this county.

Therefore, I and the entire Hinsdale County Planning Commission are unalterably opposed to any additional wilderness in Hinsdale County now, or at any time in the foreseeable future.

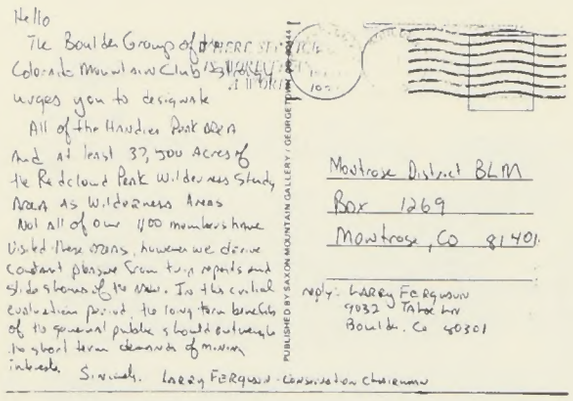
Respectfully yours,

Chap Rowe

Chap Rowe
Chairman
Hinsdale County Planning Commission

CR:aa

14



Hello
The Boulder Group of the Sierra Club
Colorado Mountain Club urges you to designate
All of the Handies Peak area
And at least 37,000 Acres of
the Redcloud Peak Wilderness Study
Area as Wilderness Areas
Not all of our 1,100 members have
visited these areas, however we derive
constant pleasure from trip reports and
slide shows of the area. In this critical
evaluation period, the long-term benefits
of its general public should outweigh
the short term demands of mining
interests. Sincerely, Larry Ferguson - Conservation Chairman

PUBLISHED BY SAXON MOUNTAIN GALLERY - GEORGETOWN, COLORADO 80444

Montrose District BLM
Box 1269
Montrose, Co 81401

reply: Larry Ferguson
9032 Tabor Dr
Boulder, Co 80301

15

San Juan Audubon Society
Durongo, Colorado 81301
May 13, 1982

RECEIVED
MAY 19'82
B.L.M. Montrose Dist.

Mr. Marlyn V. Jones, District Mgr.
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Dear Mr. Jones:

The following written comments on the Gunnison Basin and American Flats/Silverton Wilderness accompany my testimony of May 11, 1982, in Silverton.

1. I applaud the concept of B.L.M. wilderness areas.

2. I am glad to see the minimally controversial narrow arm of study areas along the Animas River recommended for wilderness (Needle Creek, West Needles Contiguous and Whitehead Gulch WSA's.) Because I have hiked in Spencer Basin (Weminuche Contiguous WSA) and feel strongly that the area has wilderness quality, I continue to support its inclusion as wilderness.

3. In regard to the Red Cloud Peak WSA, I understand that the Alpine Gulch drainage is a wonderful area, fully deserving wilderness protection. I would request that wilderness boundaries be drawn further east in order to include this drainage. If future access is needed to Red Mountain, roads from Lake City and the east could be used.

15A 4. In regard to the Handies Peak area, I suggest that B.L.M. close the road to Sloan Lake at the mine. This fragile lake will be destroyed by overuse; a well maintained hiking trail would be a good management alternative.

15B I would also request that the Cottonwood Creek area adjacent to the Gunnison National Forest be included for future wilderness consideration in cooperation with the Forest Service.

Thank you for this opportunity to comment.

Respectfully,

Jeanne T. Hemphill
Conservation Committee

New address: P.O. Box 1674, Grand Junction, CO 81502

Response to Comment Letter 15

15A Under the BLM's proposed action, the upper end of this vehicle way would be closed to motorized vehicular use.

15B The U.S. Forest Service inventoried and studied that portion of the Gunnison National Forest under the RARE II Process. Neither the U.S. Forest Service nor Congress recommended these lands for wilderness designation. The only logical way to consider the BLM area adjacent to Cottonwood Creek would be in conjunction with the Forest Service. The Forest Service has indicated they are not in a position to reconsider that decision.

16

Colorado Wilderness Network

2939 East Colfax • Denver, Colorado 80206 • 573-7870

RECEIVED
MAY 20'82
B.L.M. Montrose Dist.

Mr. Terry Reed
Mr. John Sering
Mr. Lance Nemo

May 18, 1982

Dear Sirs:

Enclosed is a copy of the statement I gave at the May 13 Gunnison Basin Hearing in Denver. I appreciate your asking me to send you a copy of it.

I appreciated also the opportunity you provided via the hearing for us to express to you our opinions on your recommendations for the WSA's in your Resource Area.

16A I wondered whether you will be attaching every single comment received to the final EIS, or only some of them? If not all of them, are the rest kept in your files and are they available to the general public?

Enclosed are a few more of our brochures, in case any one in your office might be interested.

I enjoyed meeting all of you. Thanks again for listening to all of us so patiently.

Sincerely Yours,

Rosalind McClellan, Chair
Adopt a BLM Wilderness Committee
Colorado Wilderness Network
401 Pearl St.
Boulder, Co. 80302

PS Could you check to be sure that I am on your mailing list for any future communications from your office. Thanks.

Aiken Audubon Society • Arkansas Valley Audubon Society • Aspen Wilderness Workshop • Colorado Association for River Preservation • Colorado Mountain Club • Colorado Open Space Council • Colorado Trout Unlimited • CU Wilderness Study Group • Denver Alpine Club • Denver Audubon Society • Environmental Research Group • Friends of the Dolores River • Friends of the Earth • Gunnison Wilderness Society • High Country Citizens' Alliance • Public Lands Institute • San Juan Ecological Society • San Luis Valley Wilderness Coalition • Sierra Club • Southeast Colorado Wilderness Coalition • The Wilderness Society • Two Rivers Citizens Association • UNC Colorado Public Interest Research Group • Uncompahgre Audubon Society • Upper Arkansas Wilderness Coalition • Western Colorado Resource Council • Wilderness Workshop

100% Recycled Paper

16

Statement by Rosalind McClellan
Gunnison Basin Draft EIS Hearing
Denver, May 13, 1982

The Preferred Alternative contained in the Gunnison Basin, Silver/ton American..
flats wilderness Draft EIS is an attempt to accomodate two incompatible uses, wilderness and mining, in these wilderness Study Areas.

While the recommended boundaries ostensibly preserve some wilderness, in Hundies and Red Cloud Peak WSA's, among others, they have been reduced below a point where they can sustain the integrity of the ecosystem involved. Reduced to one third and one quarter, respectively, of their original acreage, they no longer represent whole ecosystems and are like the bones without the meat.

The extent of this sacrifice is only briefly acknowledged, on p. 79, and fails to find justification on any of the grounds raised by the draft EIS.

16B

Many portions of the WSA's are excluded because they contain private inholdings or state-owned minerals. The statement is made on p. 73 that the state wants to retain these minerals, However, no mention is made of any attempt to explore the possibilities for land exchanges and minerals acquisitions, as permitted in the Wilderness Study Policy, which would allow these WSA's to maintain their integrity. The presence of 900 mining claims in Red Cloud WSA, for example, is cited as an indication of mineral potential in this area.

However, most of these claims were staked in 1979 and '80 after these areas were already identified for wilderness consideration, indicating more a concern with future wilderness closure, than the presence of commercial quantities of minerals.

A Geochemical and Geostatistical evaluation done by USGS in'79 is cited as another proof of mineral potential in these areas, although the statement is frequently made throughout the EIS that more exploration needs to be done to determine whether commercial quantities exist. A Minerals Survey will be conducted by the Minerals Management Service on any WSA's recommended as suitable for wilderness designation before going to congress. Since this survey should confirm more definitively than any existing data the presence or absence of minerals in these areas, it would seem to represent a bias against wilderness to exclude these portions of the WSA's on the basis of minerals potential alone, rather than letting the areas be carried forward through the recommendation stage, so that their mineral potential can be better ascertained.

16C

Manageability problems are cited in most cases as a reason for deleting certain portions, or all, of a WSA. The Draft EIS needs to be more specific about the kinds of manageability problems associated with trailhead access & mining claims development just outside the boundaries of a reduced WSA could possibly cause as many manageability problems from spillover impacts into the wilderness area, as if the same development were taking place, with stipulations, within the wilderness area.

Manageability problems could arise no matter how narrowly the boundaries are drawn, and buffer zones are more effective within, than outside a wilderness area.

16D

The Draft EIS should include estimates of the cost to taxpayers of managing excluded portions of the WSA's as non-wilderness, as well as the cost of managing them as wilderness. Similarly, the sections describing losses to county governments in property taxes from mining claims within wilderness areas should include the amounts of compensation received through Payment in Lieu of Taxes.

The economics argument likewise fails to justify leaving these WSA's open for mineral development. First, the fact that the Red Mountain alunite deposit is left open for development

"where it is stated that the Preferred Alternative"does not adequately represent ecologic, boundaries associated with wildlife habitat, migration, and wildlife areas."

16

2

16

3

that the original WSA boundaries are drawn so as to exclude the majority of the mining claims, mean that a substantial portion of the minerals in the areas remain open for development.

And although one of these WSA's could still contain a large deposit of some mineral, which could lead to a major new mining operation, it is uncertain how much of an associated job increase would benefit local communities, versus simply employing an influx of outsiders.

And finally, it is stated that tourism is the number one source of income for the area, generating $137,900 in 1980 in Red Cloud WSA alone. Left open to mining, these areas over the long term would witness a significant decline in recreational use, rather than generating a predictable 8% increase per year in Wilderness use. Therefore, a known, growing source of income would be reduced in favor of a boom and bust speculative one. Mineral development could wait for years for the right market conditions to occur, while these wilderness areas gradually became degraded beyond recall.

In none of the arguments does this draft EIS justify the drastically reduced WSA boundaries proposed in the Preferred Alternative, neither in its minerals potential arguments, its manageability arguments, nor its economic arguments.

Underlying all these issues is the question of what level of scarcity does a resource, such as Wilderness, become the province of the larger public, to be preserved even if it requires adjustments in its traditional uses and users.

The notion of conservation has been applied to most other resources besides hard rock minerals--oil, gas, air, and water, and it is only a matter of time until hard rock minerals fall under the same constraint, even if all public lands were open for mining.

Many new methods are being developed to lower national dependence on the types of minerals now mined in the Gunnison Basin, such recycling, substitution, synthetics, and improved ore recovery. There is no reason to destroy a resource which

4

cannot be recovered, and for which there is no substitute, for a resource which will soon have viable alternatives.

Wilderness usage is one of the fastest growing uses of public lands, according to the Forest Service. Existing wilderness areas will reach peak capacity in about 20 years, according to a study conducted by CSU professor Richard Welch, and many wilderness areas have already lost their primary sense of solitude, in parts. Hundies and Red Cloud Peak WSA's are needed in their entirety to help absorb the burden of this escalating wilderness usage, and to ensure that the next generation can still find opportunities for solitude, in wilderness areas.

Red Cloud and Hundies Peaks could be mined in the next decades, their minerals and wilderness values both exhausted in the process, and the problem of supplying an energy-hungry society would still remain. No amount of lab experimentation or recycling can replace a wilderness area once it's destroyed. Since the need to confront the problems of mineral scarcity is coming soon anyway, I propose that it be confronted now, before another wilderness area is destroyed.

I propose that the Final Gunnison Basin EIS acknowledge the urgent necessity of preserving these Wilderness Study Areas, and I support the Colorado Open Space Council recommendation.

Rosalind McClellan, Coordinator
Colorado Adopt a BLM Wilderness Program
Colorado Wilderness Network
401 Pearl St.
Boulder, Co. 80302

Response to Comment Letter 16

16A All of the comments, both oral and written that were received during the public comment period, are included in the FEIS. Comments received during the inventory process and during the study phase are kept on file in the Montrose District Office and are available to the general public.

16B In Chapter 4, Impact Analysis Assumptions is the assumption regarding acquisition of inholdings. The State of Colorado has indicated to the Director of BLM an interest in exchanging their split-estate mineral inholdings. Following designation, efforts would be undertaken by BLM to initiate exchanges. If successful, this would undoubtedly improve the management of the wilderness by reducing potential mineral development. Based on the State's position exclusion of State miners lands has not greatly affected the revised proposed boundaries in the Final EIS.

16C Impacts of activities within and adjacent to the WSAs are addressed in the final EIS. Boundaries drawn to exclude mansgeability problems are done to eliminate activities that would be very difficult if not impossible to control. When these can be anticipated in advance they are best excluded from the area being recommended as suitable

16D Management costs are anticipated to be approximately the same for wilderness designation or non-wilderness designation.

Payment in Lieu of Taxes to affected county governments can be found in Chapter 3, Common Resource Values. No change in these payments are anticipated with wilderness designation.

17

The Colorado Mountain Club

GROUPS: ASPEN • BOULDER • DENVER • DENVER JUNIOR • DENVER WILDERNESS • ES • PUEBLO
EADS MILLS • FORT COLLINS • LONGS PEAK • PIKES PEAK • SAN JUAN • WESTERN SLOPE

TELEPHONE
922-8315

2530 WEST ALAMEDA
DENVER, COLORADO 80219

OFFICE HOURS: MONDAY, TUESDAY, FRIDAY • A.M. TO P.M. AND WEDNESDAY, THURSDAY • TO P.M.

June 8, 1982

RECEIVED

JUN 10'82

B.L.M. Montrose Dist

Mr. Henri Bisson
Bureau of Land Management
P. O. Box 1269
Montrose, Colorado 81402

Dear Sir:

As a follow-on to our testimony (on the Draft Environmental Impact Statement for the Gunnison Basin and American Flats/Silverton Planning Units) I would like to offer the following clarifications to be included with our original statement.

The Colorado Mountain Club supports the following alternatives for the areas considered in the DEIS:

1) American Flats	Alternative C, the manageability alternative shown as #3 in the EIS.
2) Needle Creek	Alternative A, designation of the entire area shown as #1 in the EIS.
3) Whitehead Gulch	Alternative C, land exchange, shown as #3 in the EIS.
4) Weminuche Contiguous	Alternative C, the manageability alternative shown as #3 in the EIS.
5) Bill Hare Gulch & Larson Creek	Alternative C, the manageability alternative shown as #3 in the EIS.

We appreciate the opportunity to review and comment on the DEIS. As a large user of the recreational resources in these areas we sincerely hope that you will adopt the alternatives we have chosen as we believe they offer the best long term solution to the problem of providing continuity for the rapidly increasing need for recreation in this part of Colorado.

Sincerely,

George H. Saum

George H. Saum,
President

18

COLORADO MINING ASSOCIATION
410 Denver Hilton Office Building
1515 Cleveland Place
Denver, Colorado 80202
(303) 534-1181

RECEIVED

JUL 6'82

B.L.M. Montrose Dist

July 2, 1982

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Re: Draft Environmental Impact Statement

Dear Mr. Bisson:

On behalf of the Colorado Mining Association, I am pleased to submit comments on the Draft Environmental Impact Statement for the Gunnison Basin and American Flats/ Silverton Wilderness Study Areas.

The Colorado Mining Association is a trade association, founded in 1876 and incorporated in 1897. Its membership is composed of

a) companies that explore for, produce, and refine metals, coal, oil shale, and industrial minerals;

b) companies that manufacture and distribute mining and mineral processing equipment and supplies;

c) commercial banks and other institutions serving in the mineral industry;

d) individuals engaged in these various phases of the mineral industry.

We appreciate this opportunity to submit comments on the Draft Environmental Impact Statement. Our comments will reflect the declared policy of the Colorado Mining Association that it is imperative for the survival of our domestic minerals industry and our nation that those exploring for minerals be allowed the right to access to public lands. This policy appears to us to be particularly important in this case, since some of the areas now being proposed for wilderness appear to be intensely mineralized historic mining areas.

18

Mr. Henri Bisson
July 2, 1982
Page 2

PRELIMINARY COMMENTS

It is not the policy of the Colorado Mining Association to oppose all areas proposed to be designated as wilderness. We must express some surprise, however, that with the information available to the Bureau of Land Management relating to the existence of mineralization in some of the proposed areas, and the fact of the existence of numerous patented and unpatented mining claims within several of these areas, that a proposal for wilderness designation can be made at all.

The National Materials and Minerals Policy Research and Development Act of 1980, 30 USC 1601, states that the availability of materials is essential for national security, economic well being, and industrial production. Under the Act, the Secretary of the Interior is mandated to improve the availability and analysis of mineral data in federal land use decision making. In several respects, the Draft Environmental Impact Statement appears to ignore or down play the significant body of data available to it. No balance seems to be drawn between the critical national need for minerals and the desire for increased amounts of wilderness. With the recent large expansion of wilderness areas in Colorado, designation of a highly mineralized area as additional wilderness should be approached with grave caution.

Mineral Potential

Red Cloud Peak

All factors analyzed by the Bureau of Land Management indicate an extremely high probability of the existence of ore grade material throughout this area. This area is covered by many hundreds of unpatented mining claims, and also contains patented mining properties. The area is adjacent to hundreds of patented mining claims including many historical mining areas. The Red Cloud Peak area is essentially congruent with the Lake City Caldera, as stated in the Environmental Impact Statement. Also stated is the fact that the bounding ring fault and associated radial fracture pattern in this caldera are highly mineralized.

There are 25 parcels of patented mining property within the wilderness study area and hundreds of others outside of the area but in close proximity. More than 50 percent of the wilderness study area is covered by unpatented mining

claims. It is believed that there are approximately 900 unpatented mining claims within the wilderness study area. When viewed in terms of balancing the policy expressed in the National Materials and Minerals Policy Research and Development Act of 1980, this entire area would appear to be inappropriate for wilderneas designation.

18A The presence of various roads into the wilderness study area, combined with the problems of wilderness manageability for an isolated tract would also militate against designating this highly mineralized parcel of land as a wilderness area.

18B In addition, the economic analysis of the loss of the mineral resources reprasented by patented and unpatented mining claims within the wilderness study areas appears to be deficient. Merely totaling up the lost property tax revenues from properties currently taxed as inactive mines in no way reflects the potential loss to either the local tax base or the national economy from minerals which would or could be developed on these lands. The existence of even one small mine producing modest quantities of minerals from any property would generate property tax revenues to the county far in excess of the total for all the inactive properties. Tha loss of these property tax revenues from inactive mining properties would appear to be only the tip of the iceberg with regard to the potential economic impact of this decision. The Colorado Mining Association recommends that none of the Red Cloud Peak area be proposed for designation as wilderness.

Handies Peak Wilderness Study Area

The mineral analysis contained on page 43 of the Draft Environmental Impact Statement points out the extremely high mineralization in the area and the potential for the discovery of additional economic mineralization. As stated in the Draft Environmental Impact Statement the geology of the Handies Peak area is similar to the productive area of the Eureka District, both being a part of the San Juan/Lake City Caldera complex.

18C There are also indications in the Handies Peak area of cobalt and nickel mineralization. Both of these minerals are strategic minerals of which the United States has a very limited and unsatisfactory domestic supply. The Draft Environmental Impact Statement fails to take into account the potential impact of designating areas potentially containing the strategic minerals nickel and cobalt as a

18C wilderness area. Once again, no balance seems to be drawn between the need for wilderness and the nation's need for critical and strategic minerals which may be present inside the wilderness study area.

The land status report contained in the Draft Environmental Impact Statement notes that there are 145 acres of private land within the wilderness study area consisting of patented mining properties. 160 unpatented mining claims appear to exist within the wilderneas study area. There also exists 600 acres of state mineral lands within the wilderness study area. The Handies Peak area is directly adjacent to exceptionally active historic mining areas including hundreds of patented mining claims and mines. The area is also "cherry stemmed" by numerous existing roads which have served as access to the historic mining areas, several of which do not appear to be shown on the map of the Handies Peak area. United States Forest Service photos taken on September 19, 1973 demonstrate the presence of well maintained roads which do not appear to be revealed on maps of the Handies Peak area. These access patented mining claims in the area.

18D

The Handies Peak area also appeara to contain very aignificant faulting including major faults associated with the Lake City Caldera. These are directly related to patented and unpatented mining properties contained within the area. These faults show significant evidence of mineralization. The Handies Peak area also contains an area known as the Eureka Graben which has the potential to be highly mineralized because of significant cross faulting in the area.

All of these factors indicate that the area is highly mineralized with an excellent potential for the development of mines to serve the nation's critical needs for minerals. The Colorado Mining Association recommends that none of the Handies Peak area be recommended for wilderness designation.

American Flats

As stated in the Draft Environmental Impact Statement, there ia evidence within the American Flats Wilderness Study Area of mineralized vein syatems similar to those in adjacent areas which were mined in the past. This study area is located within the Uncompahgre caldera complex adjacent to the Eureka Graben, where many mining operations contributed to the production of precious and base metals in the past. There appear to be 44 unpatented mining claims

staked within this area. The American Flats Wilderness Study Area is adjacent to numerous patented mining properties and is directly north of areas which have been intensely mined in the past.

The proximity of this area to the historical mining areas of the Eureka Graben and to the caldera structures of the Lake City and Uncompahgre calderas, along with the exposure of sulphide bearing veins and geochemical sample data indicating a high probability of mineral occurences, particularly in the southern and eastern portions of the area, point to an excellent possibility for commercial mineralization within the study area.

It would appear that addition of the American Flats Wilderness Study area to the wilderness system would be inappropriate in light of the high probability of mineral occurences in the area. When balanced against the need for this small segment of additional wilderness area in an area already rich in designated wilderness, the national need for critical minerals would appear to dictate non-designation.

Bill Hare Gulch

The Colorado Mining Association has no information to present with regard to mineralization in the Bill Hare Gulch which would supplement that already contained in the Draft Environmental Impact Statement.

Larson Creek

The Colorado Mining Association has no additional information to present with regard to mineralization in the Larson Creek area.

Weminuche Contiguous

As stated in the Draft Environmental Impact Statement, the area is adjacent to highly productive gold and silver bearing areas associated with the Silverton Caldera. The likelihood of the occurence of veins containing base and precious metal deposits is believed to be moderate to high.

Large numbers of patented mining claims appear to exiat to the west and to the north of this area in close proximity. Several large active mines also appear to have existed very close to the wilderness study area. The entire area is rated as having very high mineral potential. The inclusion of this area within the Weminuche Wilderness Area would

appear to be completely inappropriate when balanced against the potential for future mineral exploration and development.

White Head Gulch

As stated in the Draft Environmental Impact Statement, numerous quartz - pyrite veins are exposed in the White Head Gulch Drainage, some of which show good lead and zinc values. Gold and Silver has been produced from high grade deposits within this area. Besides anomalous concentrationa of gold, silver, lead, zinc, and copper in the White Head Gulch Drainage, anomolies are all shown for molybdenum and tin. Overall, the area showa significant mineralization.

There appear to be 70 unpatented mining claima within this area. Becauae of the inherent possibility of future discoveries of additional mineral deposits within the White Head Gulch Wilderneaa Study Area, its inclusion in the national wilderness preservation system would be inappropriate. The preferred alternative reflected in the Draft Environmental Impact Statement fails to take into account the data on mineralization which appears to be readily available. This appears to be in direct contradiction to the mandate of the National Materials and Minerals Policy Research and Development Act of 1980.

Needle Creek

The Colorado Mining Asaociation has no additional information to present with regard to mineralization in the Needle Creek Wilderness Study Area. As stated in the Draft Environmental Impact Statement, approximately 100 mining claims are recorded with the Bureau of Land Management in the central part of this area. Areas just to the east of the Needle Creek area show concentrations of copper, lead, zinc, molybdenum, silver, chromium, nickel, and tin.

Failure to State Costs of Action

18E As previously stated under the discussion of Red Cloud Peak, it is unfair to represent the total economic cost of establishing the new wilderness area as the loss of current tax revenues from county taxation of inactive mining properties. Historically, inactive mining properties have been taxed at only a nominal level. These comments apply aa well to all proposed wilderness areas containing patented and unpatented mining properties.

18E Currently, Colorado counties are allowed to tax mineral production as part of their property taxation mechanism. The tax revenues from even a small mine can dwarf tax revenues from inactive mining properties. The assumptions contained in the Draft Environmental Impact Statement would only hold true if it is assumed that no commercial mineral production could ever result from these highly mineralized areas.

Utilization of Existing Information

18F To our knowledge, the Bureau of Land Management has expended close to $200,000 in the preparation of open file report OF-599 "Geochemical and Geostatistical Valuation, American Flats -Silverton Planning Units". This is popularly known as the Barringer Report. It would appear that the Barringer Report was utilized in mapping those zones of the proposed wilderness areas with regard to whether development for mineral potential was high, moderate or low. The decisions reached in recommending potential wilderness areas from the study areas appear to pay no heed to the obvious conclusions of the Barringer Report. This is precisely the sort of information which the Bureau is mandated to consider and to integrate into its planning process under the terms of the National Materials and Minerals Policy, Research and Development Act of 1980.

Lack of Balancing

Areas containing significant mineralization capable of sustaining profitable mining activity are relatively rare. Several areas with high mineralization lie directly adjacent to or within several of the proposed study areas including Red Cloud Peak, Handies Peak, American Flats, and Weminuche Contiguous.

In contrast to this, Colorado has recently seen very substantial additions to its existing wilderness areas pursuant to congressional action on recommendations developed during the Forest Service Rare II Study. The Draft Environmental Impact Statement should not operate in a vacuum; as areas designated as wilderness increase, even greater balancing is necessary to insure that highly mineralized areas, especially those with active mining histories, are not included in future wilderness additions. Some

18G comparison must be made between the total amount of wilderness currently available within the state as compared to the relative amount of acreage with a highly mineralized character available for mineral exploration. This comparison does

18G not seem to have been made in the Draft Environmental Impact Statement. The Colorado Mining Association considers it to be crucial.

Irreversible Impacts

The Draft Environmental Impact Statement states at many points that failure to designate the proposed areas as wilderness would result in irreversible damage from future mineral exploration or mining activities. It should be recalled that several of these areas have been under wilderness management for several years. Most importantly, several of the areas including Red Cloud Peak, Handies Peak, American Flats and Weminuche Contiguous are directly adjacent to intensely mined areas and have been subject to mineral exploration for more than 100 years. If the alleged impacts have not become irreversible over the last 100 years, the assumption that they would be degraded irreversibly in the future seems to be unfounded. Experience has demonstrated that available management techniques short of wilderness designation can protect the area's visual resources while still allowing exploration and mining to proceed.

Qualification of Staff

The Draft Environmental Impact Statement seems to stop short of evaluating the economics of developing the mineralization which it has identified. Considering the volume and scope of the data which is available regarding mineralization in the wilderness study areas, far more extensive expertise would be needed to properly evaluate the potential for economic mineral development within the study areas. This would be equally true for the potential loss of economic values to the nation from designation of these areas as wilderness.

SUMMARY

The Colorado Mining Association appreciates the opportunity to comment on the Draft Environmental Impact Statement for the Gunnison Basin and the American Flats - Silverton Wilderness Study Areas. The Association is of the belief that a large volume of data relating to the mineralization within these areas has been made available to the Bureau, including the very costly Barringer Report, OF-599. Based upon the existence of high levels of mineralization in the various areas, the apparent presence of strategic minerals, the existence of historic mining areas, and the

existence of numerous patented and unpatented mining properties, the association recommends that no part of the Handies Peak, Red Cloud Peak, American Flats, or Weminuche Contiguous areas be designated as wilderness.

Respectfully submitted,

By John R. Henderson
John R. Henderson, Chairman
Wilderness Subcommittee

JRH/clg

Response to Comment Letter 18

18A There are no roads included within the boundaries of the Wilderness Study Area. In areas containing "cherrystemmed" roads or ways, considerations were made to eliminate or reduce potential wilderness manageability conflicts.

18B An attempt has been made in the Final EIS to address the mineral development that might potentially occur in each of the WSAs. This has been done primarily in terms of location and size of operation and potential minerals that could be recovered. These possibilities have been detailed in Chapter 2. The loss of revenue from mineral development foregone is not quantifiable given the uncertainties related to their potential development. Any valid existing rights would be allowed to be developed and would not be foregone. The effect of an alunite mine in Redcloud Peak on employment and a per capita income has been added to the mineral discussions for each alternative in Chapter 4.

18C Several comments stated that the DEIS failed to point out that certain of the identified mineral commodities were strategic and critical minerals. Particularly, nickel and cobalt were cited.

Besides nickel and cobalt, the following items identified in the DEIS also appear on the list of strategic and critical minerals: aluminum, beryllium, copper, lead, zinc, molybdenum, silver, tungsten, vanadium.

The complete list of materials on the National Defense Stockpile Inventory of Strategic and Critical Materials may be found in the Stockpile Report to the Congress, October 1979 - March 1980, submitted by the Federal Emergency Management Agency, March 31, 1980.

This document was referenced in the DEIS but inadvertantly not cited in the document. It has now been included in this document under "Affected Environment - Common Resource Values - Geology and Mineral Deposits".

Since the writing of the DEIS, exploration within the Handies Peak WSA, consisting of one drill hole, has revealed indications of certain strategic and critical minerals in the vicinity of the ring fault system of the Lake City Caldera. The drill core data substantiate the findings of the Berringer Report (OF-955), which was based on stream sediment geochemistry and surface sampling, as well as geophysical methods. In the core assay were anomalous concentrations of molybdenum and chromium, as well as traces of numerous other metals, many of which are strategic and critical.

This additional information is, of course, very preliminary, and is not intended to prove that there are commercial deposits of these elements, but merely that there are geologic conditions present which are favorable to the concentration of certain minerals. Any claim showing valid existing rights would be allowed to develop those minerals.

18D A road was identified near the townsite of Sherman which provides access to patented lands. This road and private land has been recommended non-suitable for wilderness designation in the proposed action. There are some other existing ways within the WSA, but these have not been maintained to ensure relatively regular and continuous use.

18E See previous response to letter 18B.

18F The Barringer Report, was utilized in developing the recommendations, but was only one of several factors evaluated in studying the various significant resource values.

18G Comment states that a comparison should be made between the total amount of wilderness available and the acreage with a highly mineralized character available for mineral exploration within the state.

No assessment of total area of "highly mineralized character" exists for the state. However, a mineral trend generally referred to as the "Colorado Mineral Belt" is a zone of mineralization of variable width extending in a NE-SW orientation from the Front Range, west of Boulder, to the LaPlata Mountains, north of Durango.

All of the WSAs considered in the DEIS are within this zone, as are all or a portion of ten areas already designated as wilderness. This is not to say that all acreage within the area called the Colorado Mineral Belt is highly mineralized, but the majority of all metallic mineral production in Colorado has been from within this zone. A rough estimate is that approximately 10 to 15 percent of the highly mineralized area in the Colorado Mineral Belt is within designated wilderness.

19

Colorado Wilderness Network

June 30, 1982

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Dear Mr. Bisson:

We appreciate the opportunity to comment on the Gunnison Basin and American Flats-Silverton Wilderness Draft Environmental Impact Statement, henceforth refferred to as the "DEIS". The efforts by BLM to hold public hearings in Denver as well as in local communities is particularly commendable. We hope this represents a precedent for future BLM Wilderness DEIS' hearings in Colorado.

We were generally disappointed in the preferred alternative of the DEIS which found only 28,465 out of 78,135 acres of Wilderness Study Areas to be suitable for wilderness designation. This is a surprisingly low percentage for a region of the state noted for its spectacular beauty and alpine scenery, of which the BLM WSAs comprise a significant portion. Our greatest disagreements are with Redcloud Peak and Handies Peak WSAs. As a result, we have proposed alternatives for Redcloud and Handies Peaks representing slight departures from alternatives identified in the DEIS. Overall, we are proposing approximately 68,150 acres of WSAs as suitable for wilderness designation.

It is fervently hoped that the inadequacies of the Gunnison Basin DEIS do not foreshadow future BLM wilderness studies. We are particularly distressed by the lack of interagency cooperation in land use planning, the widespread manipulation of manageability considerations to dismiss acreage from suitability for wilderness, and the preeminence of mineral resources over every other resource.

There is recurrent evidence of the lack of willingness by BLM to cooperate with the Forest Service in land management decisions. We would remind BLM that Sec. 202 (c) of FLPMA requires cooperation between federal agencies in land use planning. The lack of coordination between BLM and the Forest Service is most evident in the case of Handies Peak, and to a lesser extent with Bill Hare Gulch and Larson Creek. The bottom line is that intelligent land use decisions can not be made when areas are dissected by nonsensical administrative boundaries.

According to the DEIS, funding is not supposed to affect manageability considerations (page 69). Yet some of the preferred alternatives

Aspen Audubon Society • Arkansas Valley Audubon Society • Aspen Wilderness Workshop • Colorado Association For River Preservation • Colorado Mountain Club • Colorado Open Space Council • Colorado Trout Unlimited • CU Wilderness Study Group • Denver Alpine Club • Denver Audubon Society • Environmental Research Group • Friends of the Dolores River • Friends of the Earth • Gunnison Wilderness Society • High Country Citizens' Alliance • Public Lands Institute • San Juan Ecological Society • San Luis Valley Wilderness Coalition • Sierra Club • Southeast Colorado Wilderness Coalition • The Wilderness Society • Two Rivers Citizens Association • UMC Colorado Public Interest Research Group • Uncompahgre Audubon Society • Upper Arkansas Wilderness Coalition • Western Colorado Resource Council • Wilderness Workshop

100% Recycled Paper

19

page 2

can only be justified on the basis that they represent the smallest commitment of manpower and monetary resources to the management of the land. It is becoming increasingly apparent that drastic management redirection is occurring within BLM with concomitant budget reallocations from renewable, non-revenue producing activities (such as recreation and wildlife) to non-renewable income generators (i.e., minerals). Some results of this are staffing limitations that may preclude discussion of land exchanges to eliminate state owned minerals conflicts and the curtailment of surveillance activities. The projected attitude of BLM appears to favor the removal of potential problems by the elimination of acreage from wilderness recommendations. Monitoring activities requiring time and effort by BLM are being ignored as feasible management alternatives which would allow for designation of land as wilderness. It is unfortunate that the management considerations of BLM smack of economic expediency as opposed to carefully reasoned approaches to the best resources of the WSAs.

The minerals cited as potentially present in economically recoverable quantities are recyclable materials, present supplies of which can be greatly extended by conservation and reuse. Wilderness is a diminishing resource which also must be conserved. The short term need for minerals of the sort expected to be present in the Gunnison Basin WSAs is debatable. Over 300 miners have been fired in recent closures of 5 precious metals mines in Colorado, 4 of which are in southwestern Colorado. The Sunnyside Mine near Silverton, the Ozark Mine and Revenue-Virginius Mines near Ouray, and the Bulldog Mine near Creede have all drastically reduced operations. In contrast, wilderness use is rapidly increasing at a rate BLM has projected as 5 per cent annually. It makes little sense to forego wilderness, a non-renewable resource for which there is no substitute if destroyed, in favor of hypothetical minerals of dubious immediate need.

The preference by BLM for alternatives which exclude land with state subsurface rights is unprecedented. We are aware of recent BLM decisions concerning split-estate BLM managed lands in Arizona and New Mexico. These decisions should not and do not apply to WSAs within the Gunnison Basin and American Flats-Silverton Planning Units. The United States Congress has not excluded large acreages of lands under consideration for wilderness designation in the past simply because of non-federal surface or subsurface ownership of small portions of these lands. The Congress can not be expected to do so in the future either. The 1980 Colorado Wilderness Act designated many areas as wilderness which contained non-federally owned land within them. In fact, the Forest Service wilderness system in Colorado presently encompasses some 11,000 acres of non-federal lands. BLM is clearly in contradiction to Congressionally established public policy in its insistence upon exclusion of split-estate lands from wilderness recommendations.

19

page 3

Our recommendations concerning the WSAs in the Gunnison Basin and American Flats-Silverton Planning Units follow. We have attempted to minimize BLM perceived conflicts with the state over mineral ownership where possible, i.e., where inclusion of such lands is not absolutely vital to the ecological integrity of an area. It is not our position, however, that the existence of split-estate lands within potential wilderness constitutes a conflict resolvable only by elimination of such lands from wilderness, as BLM would have us believe.

REDCLOUD PEAK (CO-030-208)

We cannot agree with BLM's preferred Conflict Resolution II Alternative for Redcloud Peak WSA. This alternative sacrifices ecological integrity of the area for mineral deposits of unknown value and location, the need and economics of which are in great doubt.

Redcloud Peak WSA is roundly recognized as an area with outstanding solitude and recreational opportunities along with "scientific and educational as well as geologic and ecologic values as this area is an extinct volcanic caldera with abundant wildlife—deer, elk, bighorn sheep, and golden eagles." (page 33 of the DEIS) Yet BLM prefers an alternative which "does not adequately represent ecologic boundaries associated with wildlife habitat, migration, and wildlife use." (page 79) This refusal by BLM to protect the identified and quantifiable wilderness resources of Redcloud Peak WSA is at the heart of our disagreement with the preferred alternative.

The drainages of Alpine Gulch, Owl Gulch, and Copper Gulch are the major points in question. These are lower elevation environments which add ecologic variability to the WSA and expand the wilderness concept beyond the rock and ice so often favored by our public land agencies. These drainages provide access routes heavily used by visitors to the area such as Colorado Outward Bound School and the Colorado Mountain Club. Alpine Gulch is of particular interest to recreationists in that it provides much needed protection and abundant area for the dispersal of campers. In contrast, Silver Creek, included within the boundaries of BLM's preferred alternative, is a small V-shaped valley which tends to concentrate recreational users. Much of the rest of BLM's preferred alternative consists of steep talus slopes makin' for hazardous and unsuitable campsites.

The need for mineral deposits possibly within the WSA and the feasibility of their recovery is open to much discussion. Alpine Gulch is excluded from the preferred alternative due to its possibility as an access route for the development of the alunite deposit on Red Mountain. It is extremely unfortunate that de facto wilderness is being awarded in favor of unneeded minerals. There are several points requiring consideration:

(1) Aluminum is easily recycled. There are no existent shortages of the metal and few should be anticipated given the readily renewable nature of aluminum.

(2) The Red Mountain alunite deposit will be of great expense to extract given present technology. The continuing absence of mining operations of the deposit confirm this view.

(3) The large scale socio-economic disruptions in Lake City which will necessarily accompany any development are not slight and can not be ignored in consideration of the feasibility of mining operations. Mining operations would require large open tailings piles with extensive acid mine drainage and other hazardous wastes, a large metal extraction plant with likely large energy usage, and extensively upgraded transportation facilities.

(4) Alternative alunite deposits (notably in Carbon County, Utah) exist with greater ease of accessibility and fewer resource conflicts.

In light of these facts--the questionable need for additional supplies of aluminum, the likely economic infeasibility of extraction, the socio-economic upheavals accompanying mining operations, and the existence of other more accessible alunite deposits--we find it deeply disturbing that Alpine Gulch and its attendant outstanding wilderness values are being relegated to insignificance in comparisonto the alunite deposit.

19B

Our Ecological Integrity Alternative incorporates Alpine Gulch within the confines of a Redcloud Peak Wilderness while excluding the majority of Red Mountain from wilderness, as indicated on an accompanying map. In addition to the two access routes presently being used to reach Red Mountain, two major drainages are left outside of our proposed boundaries--Red Mountain Gulch and Wade Gulch. This concession allows for siting of support facilities attendant with development of the Red Mountain alunite deposit, however unlikely, while protecting Alpine Gulch for continued use and enjoyment by all. We find it highly insensitive of BLM to ignore wilderness values of its land in order to provide for every conceivable development scheme put forth by private interests.

19C

The other potential hardrock mineral deposits within the WSA were cited by mineral industry representatives at the May 13 hearing on the DEIS in Denver as being extremely deep (5,000-10,000 feet). It is very doubtful as to the operability of these deposits with present technology. Why must documented wilderness values be foregone in favor of hypothetical mineral deposits? Such mineral deposits may still be searched for and developed if need be under the provisions of the Wilderness Act since the claims have already been staked. The rash of mining cutbacks and cloaures both in Silverton and statewide indicates scant pressing need for additional sources of similar minerals.

Finally, the reason for BLM's preference of Conflict Resolution 11 Alternative is the elimination of state owned minerals from the acreage recommended as suitable for wilderness. Reiterating our position as stated in the introduction to this reaponse, we do not believe that the recent IBLA split-estate decision is applicable to Redcloud Peak WSA. It has never been the position of the United States Congress to exclude acreage form wilderness designation on a wholesale basis because of incomplete federal ownership. BLM is

jumping ahead of itself in whittling down Redcloud Peak WSA on the basis of unconfirmed conflicts. Land exchanges are a recognized and oft-used management procedure which BLM should digilently pursue in the face of state uses of its minerals sections which are incompatible with wilderness. In the meantime, the identified outstanding wilderness characteristics of Redcloud Peak WSA should be preserved.

Our proposed Ecological Integrity Alternative encompasses approximately 37,000 acres of Redcloud Peak WSA's 40,575 total acres. The Ecological integrity Alternative takes advantage of the opportunity to protect heavily used wilderness values while still leaving open the option for future mineral development.

HANDIES PEAK (CO-030-241)

19D

We can not support the BLM's preferred Conflict Resolution Alternative for Handies Peak WSA. BLM land management analysis continues to ignore the reality of the lay of the land. Administrative boundaries are regularly cited as insurmountable barriers to comprehensive land use planning. The public has requested on numerous occasions that the Forest Service Carson Peak-Pole Creek Mountain roadless area and the BLM "Lake Fork"-Handies Peak roadless area be cooperatively studied. (Refer to Exhibits A,B, and C.) in reply to these concerns, former BLM State Director Dale Andrus stated in a letter dated June 9, 1977: "The District's planning coordinators met recently to discuss agency planning schedules in the Upper Rio Grande, Gunnison, and American Flats area, as well as the North Fork, Grand Mesa, Muddy, and West Elk areas. They are currently developing coordinated preparation plans on these areas. You should also note that the Montrose District Staff is working closely with the Gunnison-Grand Mesa-Uncompahgre and Rio Grand Forest Supervisors and their personnel to jointly study and analyze the area you mention." (emphasis added) (refer to Exhibit D)

Where is the evidence of this coordinated planning? It is certainly not in the Gunnison Basin and American Flats-Silverton Wilderness DEIS! A comment is made (p. 84) that the "lack of adjacent federally endorsed wilderness" makes the eastern portion of the WSA unsuitable for wilderness. This lone statement hardly reveals evidence of "coordinated preparation plans" or attempts to "jointly study and analyze" the wilderness values of a combined Handies Peak-Carson Peak roadless area, as the Montrose District was directed to do by the State Director. The District has been remiss in pursuing options most beneficial to the lands in question.

Andrus states that public involvement is "inherent in the development of our regional land use plans. Mechanisms for ensuring this input are an integral part of our planning process which involves individuals and interest groups, as well as other agencies."

Again, there is no evidence of involvement of other agencies, i.e., the Forest Service. In spite of all assurances to the contrary, the differing and rigid schedules of the competing public agencies have excluded public involvement on decisions concerning the entire, naturally cohesive Handies Peak-Carson Peak roadless area.

There is no doubt aa to the wilderness qualities of the Handies Peak-Carson Peak roadless area. Carson Peak received a Wilderness Attribute Rating System (WARS) score during RARE 11 that is greater than or equal to that of several now designated wildernesses such as Maroon Bells additions, Collegiates, West Elk additions, Raggeds, and South San Juans. Much of Carson Peak is comprised of large, rolling expanses of tundra providing an unrestricted sense of openness with great opportunities to wander. Similar unconfined recreational opportunities were a major reason cited by BLM for wilderness recommendation of Powderhorn Primitive Area (refer to page 9 of the Draft Wilderness Suitability Report for Powderhorn). BLM has verified the wilderness values of Handies Peak in its designation of the area as a wilderness sutdy area. Clearly, the wilderness values of this particular part of Colorado are not in doubt.

The resources of the Handies Peak-Carson Peak roadless area offer few obstacles to wilderness designation. The eastern portion of Handies Peak WSA which BLM has omitted from recommendation as suitable for wilderness has negligible potential for mineral production as well as minimal timber potential. (Carson Peak RARE II area was also determined to have minimal potential for critical and non-critical minerals, oil and gas, geothermal, uranium and coal.) Non-wilderness designation fo the eastern portion of Handies Peak WSA could lead to "disturbance of the bighorn sheep winter range along the Lake Fork, Cataract Gulch, and Boulder Gulch" resulting "in a reduction of herd size" (p. 82 of the DEIS). Winter range is the determining factor in big game populations. Reduction of winter range acreage should be actively avoided. This portion of the WSA is heavily used by the Colorado Outward Bound School on a yearly basis. The area contains numerous scenic waterfalls and cascades. In light of all this, there is no reason for a non-wilderness recommendation for the eastern portion of Handies Peak WSA.

The so-called manageability arguments cited by BLM by way of rationale against recommendation as wilderness of the eastern portion of Handies Peak WSA are flimsy at best. Similar instances of designated or recommended wilderness of one agency being bounded by non-endorsed, non-wilderness lands administered by another agency exist in Colorado. The Forest Service Rawah Wilderness is bounded on the west by lands (the Colorado State Forest) administered by the Colorado Board of Land Commissioners, whose charge is to maximize revenue from the state land under their jurisdiction. Yet this did preclude Congressional designation of the Rawah Wilderness. The rough terrain of eastern Handies Peak WSA will further serve to deter non-wilderness activities from encroachment. The BLM argument of

unmanageability due to adjacent Forest Service non-wilderness lands is thus highly questionable and indefensible.

Difficulty of trail construction through the rugged terrain of the eastern portion of the WSA was cited by one BLM official at a public hearing as evidence of unmanageability. Two trails, one in Cuba Gulch and another along Cataract Gulch, presently provide access into the area. The infrastructure for recreational use is already in place.

19E

We propoae an alternative incorporating the above ideas while at the same time addreasing some of BLM's concerns in their preferred Conflict Resolution Alternative. Our preferred alternative, the Comprehensive Wildernesa Alternative, recognizes the outstanding wilderness values of the region irrespective of BLM, Gunnison National Forest, or Rio Grande National Forest jurisdiction. The wilderness character of the land takes precedence over administrative limitations. Our Comprehensive Wilderness Alternative includes boundaries compatible with the Colorado Wilderness Network's Alternative W recommendation for Carson Peak RARE II area. These boundaries are indicated on the accompanying map. In recognition of BLM concerns, we omit the state owned minerals section north of Whitecross Mountain. We also omit the majority of state minerals in the western portion of the WSA by following the divide along Jones Mountain and Crown Mountain to the National Forest boundary between Gunnison and Rio Grande National Forests. The rest of the WSA is recommended for wilderness. We have also located our boundary in American Basin below the BLM boundary.

Our Comprehensive Wilderness Alternative is a reasoned approach to the best uses of the resources of the Handies Peak-Carson Peak region. We omit potential conflicts as perceived by BLM while protecting those areas of outstanding wilderness character and limited resource development potential. Our alternative addresses the special interests of all parties and commands extensive public support. (A note of intereat is that of 1253 inputs received by the Forest Service on Carson Peak during RARE 11, fully 88%, or over 1100, supported wilderness.)

The Comprehensive Wilderness Alternative would recommend roughly 16,500 of 18,860 acres within Handies Peak WSA for wilderness designation.

AMERICAN FLATS (CO-030-217)

We concur with the BLM's preferred Conflict Resolution Alternative for American Flats which recommends 1505 of 4710 acres as suitable for wilderness. Designation of this portion of the WSA is necessary to the topographic and ecologic integrity of the Big Blue Wilderness. The Big Blue is naturally rounded out by inclusion of the uppermost reaches of Cow Creek and Wildhorse Creek. The rolling tundra

around Wildhorse Peak and American Lake adds to the diversity of Big Blue by increasing the variety of recreational opportunities present. The Conflict Resolution Alternative also concedes to minerals interests lands of moderate mineral potential that might conceivably yield deposits of economic value at some future date.

NEEDLE CREEK (CO-030-229B)

Congressional intent as to the suitability of Needle Creek WSA for wilderness designation was made abundantly clear by the Colorado Wilderness Act of 1980, PL 96-560. The Colorado Wilderness Act designated additions to the Weminuche Wilderness lying to the south and east of Needle Creek WSA. The topographic configuration of these additions (East Animas and Florida River) indicates Congressional desire for wilderness designation of Needle Creek as it now separates two distinct units of the Weminuche. Any land use recommendation other than wilderness would result in management conflicts with Congressionally desired uses.

Needle Creek possesses outstanding wilderness characteristics as well. Tremendous panoramic views of surrounding ranges from Mountain View Crest combined with a string of alpine lakes make for outstanding opportunities for solitude and primitive recreation. In recognition of these superb wilderness qualities, we support the preferred alternative for Needle Creek WSA--the Wilderness Manageability Alternative recommending 4160 acres as suitable for wilderness.

BILL HARE GULCH and LARSON CREEK (CO-030-085 & CO-030-086)

We support the Wilderness Manageability Alternative for Bill Hare Gulch and Larson Creek WSAs. Designation of these portions of the WSAs will facilitate management of the adjacent Big Blue Wilderness by the Forest Service by including within the wilderness boundaries natural topographic extensions of the wilderness. It would be hoped that our public land managing agencies would work together to ensure adequate protection of designated wilderness. It is stated to the contrary on page 90 and again on page 92 of the DEIS that "the non-designation of the WSA as wilderness would create manageability problems for the wilderness values of the contiguous U.S. Forest Service wilderness area." (emphasis added) The BLM's preferred No Wilderness Alternative appears to be in conflict with the stated desire of the United States Congress. The Conference Report on H.R. 5487, the Colorado Wilderness Act of 1980 (H. Rept. No. 96-1521) states:"The Congress finds that--(1) many areas of undeveloped National Forest System lands in the State of Colorado possessoutstanding natural characteristics which

give them high values as wilderness and will, if properly preserved, contribute as an enduring resource of wilderness for the benefit of the American people." (emphasis added) BLM is ignoring this stated Congressional desire as to the proper preservation of the Big Blue Wilderness by proposing management actions which will result in manageability problems (by BLM's own admission) which could threaten the Congressionally determined wilderness values of the Big Blue.

Additionally, there are no overriding resource conflicts which preclude suitability of Bill Hare Gulch and Larson Creek from wilderness. As a matter of fact, on page 91 of the DEIS, BLM states: "There are no existing mineral or other commodities, and very little potential for any to be developed."

Given the manageability problems non-wilderness designation of Bill Hare Gulch and Larson Creek WSAs will create for the Forest Service managed Big Blue Wilderness in direct contradiction to Congressional findings, and given the absolute lack of resource conflicts with wilderness, we request that the Wilderness Manageability Alternative be selected for Bill Hare Gulch and Larson Creek. This represents 325 and 480 acres, respectively, of land deemed suitable for wilderness.

WHITEHEAD GULCH (CO-030-230B)

The Colorado Open Space Council, among others, initially supported BLM's current preferred alternative of Wilderness Manageability in response to public comment on proposed alternatives last fall and again in May at public hearings on the DEIS. Recent information has led to reevaluation of that position.

Our new information concerns the regional problem of water quality in the San Juan Basin and specifically in the Animas River watershed. The Forest Service has evaluated the potential of the Animas River for study as a possible candidate for the National Wild and Scenic Rivers System. They concluded that it did not qualify due to its extremely poor water quality. Specifically, zinc and heavy metals contamination and occasional sulphuric acid discharges into the river due to mining activity in the Silverton vicinity have lowered the Animas River water quality to unhealthy levels. The zinc level is so high that benthic organisms can not be supported. However, this hazardous condition is mitigated downstream from Silverton by inflow from side drainages, some of which include Whitehead Gulch and the other drainages of the WSA. A detailed analysis of the problem is to be included with the San Juan National Forest Plan, due out in late 1982. Preliminary information is courtesy of Milt Robinson of the Forest Service Region II office Watershed and Minerals division.

The All Wilderness Alternative provides the best management tools for protecting the watershed of the Animas River. Wilderness designation of all 6200 acres of Whitehead Gulch WSA will prevent further deterioration and degradation of water quality of the Animas.

It will reduce the need for future expensive corrective actions.

Another important reason for designation of the entire WSA lies in the visual corridor that Whitehead Gulch forms, along with Needle Creek WSA, West Needles Contiguous WSA, and West Needles WSA (FS). Thousands of visitors annually pass through this corridor on the Durango-Silverton Narrow Gauge Railroad. Their enjoyment of the ride is dependent upon the naturally pristine condition of the land bordering the tracks. The recreational experience of these visitors will be degraded by alteration of this visual corridor. The All Wilderness Alternative best serves to protect the entire visual corridor.

No additional manageability difficulties will arise as a result of the All Wilderness Alternative. The extremely steep and rugged terrain discourages motorized intrusions and other uses incompatible with wilderness. Recreational access to the entire WSA is excellent in the form of Whitehead Trail and the trail east from Elk Park.

WEMINUCHE CONTIGUOUS (CO-030-238B)

For the same reasons as detailed in the above discussion of Whitehead Gulch, we support the All Wilderness Alternative for Weminuche Contiguous which preserves the integrity of entire watersheds. The BLM's preferred alternative of Wilderness Management omits 4 of the 5 drainages within the WSA from recommendation as suitable for wilderness. Designation of all 1985 acres of Weminuche Contiguous will serve to discourage destruction of watersheds such as has occured in nearby Arrastra Basin, immediately north of the WSA. Arrastra Basin is a moonscape of tailing piles, abandoned shacks, and sand bars oozing across Silver Lake. The water of Silver Lake consists of silt laden muck. The potential for similar watershed disasters will be reduced through protection as wilderness.

Weminuche Contiguous WSA contains the headwaters of two major creeks draining into the Animas including one drainage in the northern section of Whitehead Gulch WSA. As determined by the Forest Service, these tributaries alleviate the severe water quality problems of the Animas.

The high basins of the WSA are pristine, high quality wilderness in and of themselves. Wilderness designation will protect important mountain goat winter range, an increasingly scarce resource. Excellent recreational access is provided by 3 trails into and through the WSA. Manageability of the Weminuche Wilderness will be enhanced by the added buffer against development provided by the WSA.

Consideration of all of these indicates the necessity for wilderness designation of all of Weminuche Contiguous.

We hope to see detailed response to our concerns in the Final EIS. Once again, the opportunity for public input is greatly appreciated.

Norm Mullen
Norman J. Mullen
Wilderness Workshop
Colorado Open Space Council

Michael Scott
Michael Scott by DS
The Wilderness Society

Marty Sorensen
Marty Sorensen by MP
Chairman, Wilderness Committee
Rocky Mountain Chapter
Sierra Club

Mark Pearson
Mark Pearson
CU Wilderness Study Group

cc: Jimmy Wilkins
George Whitlock, Jr.
Sen. William Armstrong
Sen. Gary Hart
Rep. Ray Kogovsek
George Francis

19

UNIVERSITY OF COLORADO WILDERNESS STUDY GROUP

April 8, 1977

Dale Andrus State Director
Bureau of Land Management
1600 Broadway
Denver, Colorado

Dear Mr. Andrus:

By 1978, the Rio Grand National Forest should have their draft EIS completed on the Upper Rio Grande Planning Unit. In a letter dated 1973, from the Cabolla Ranger District, the proposal for the Lake Fork area is to maintain its primitive condition. Support for wilderness also seems likely for Pole Mountain, which contains several 13,000 foot peaks and much of it is unmarred by intrusions.

In view of the existing resource value, a large tract of BLM land lies contiguous to Pole Mountain and should be studied along with the Forest Service's planning schedule. Efforts between two different agencies must be heighten considering the highly precarious nature of undeveloped areas. Administrative decisions should be kept in line between all agencies involved, in order to assume a practical management decision for an entire geographical roadless area.

If future development of all roadless areas is to be done wisely and in the best public interest, all agencies who are in the position to contribute to a common planning effort, should do so. In Colorado alone this same circumstance will arise many times, judging by a map showing planning units in the state.

The C.U.W.S.G. proposes that a study be conducted over the entire geographical roadless area instead of creating arbitrary boundaries decided upon long ago. This long narrow strip of BLM land can possibly provide social and economic benefit to the area as wilderness. Each additional acre of land serves to enchance the overall wilderness quality of a region. We hope that the BLM will initiate a study and keep the group involved with the planning effort.

Sincerely,

UNIVERSITY MEMORIAL CENTER BOULDER, COLORADO 80302 (303)492-6870

19

March 18, 1977

Dale Andrus
State Director
Bureau of Land Management
1600 Broadway
Denver, Colorado

Dear Mr. Andrus:

The Rio Grande National Forest will soon be beginning work on the Upper Rio Grande Planning Unit. The unit includes two Forest Service roadless areas: Pole Mountain and Lake Fork. A draft EIS for the FS land use plan is scheduled to be released in the summer of 1978, and we believe that a Wilderness designation for these areas will be a viable alternative.

The reason for bringing this to your attention is basic; a substantial tract of BLM roadless land lies contiguous to the Pole Mountain roadless area. We believe that this land should be studied cooperatively with the National Forest land. The present boundary separating these lands is historic and political, but nowhere is it based on topography or common sense. Therefore, to consider these areas separately would insult the integrity of the unit as a whole while ignoring Sec. 202 (c) of the new BLM Organic Act which calls for coordinated land use decisions between federal agencies.

There will undoubtedly be many instances of similar circumstance in the near future; so, it is important that communication and coordination between agencies be improved.

We must not allow arbitrary lines, often a century in age, to force us into poor land use decisions. We are certain that you would agree.

Sincerely,

Fred Harden
Co-Director
COSC Wilderness Workshop

cc: Craig Rupp USFS
James Mathers USFS
Janet Goodnoe University of Colorado Wilderness Study Group
David Sumner

19

Exhibit C

P.O. Box 7403
Denver, CO 80207
March 14, 1977

Mr. Dale Andrus
State Director
Bureau of Land Management
1600 Broadway
Denver, CO

Dear Dale:

For some years now I have been concerned about the sometime lack of coordinated planning between the BLM American Flats area west of Lake City and adjoining National Forests. This matter first occurred to me in conjunction with the Uncompahgre Primitive Area studies conducted by the USFS in the early '70s.

Now another situation has come up which raises the same issue. The Rio Grande National Forest, this spring, will commence work on its Upper Rio Grande Planning Unit which will include two inventoried USFS roadless areas: Pole Creek Mountain and Lake Fork. Together these comprise about 80,000 acres on the Rio Grande and Gunnison National Forests. Though both these areas came out "non-selected" for wilderness study in the USFS Roadless Area Review and Evaluation process of the early '70s, it's the opinion of a number of people that they are excellent wilderness candidates.

Immediately north of the Lake Fork Roadless Area is a long, narrow strip of BLM land reaching from elevations of 12,000 feet just below the Continental Divide down to about 9,500 feet along the Lake Fork of the Gunnison River. I'd guess that between 7,000 and 10,000 acres are involved from eyeballing the map, maybe more, maybe less. Precise acreage can be checked on the Redcloud Peak and Lake San Cristobel USGS quads.

Topographic logic says that these BLM lands are of a piece with the USFS roadless area and should be given wilderness study with them. The boundary between the two jurisdictions bears no relation to environmental realities.

It is my understanding that the Montrose office of the BLM, in 1972-73, determined that the "Lake Fork strip" should be dedicated to multiple use management. That office has further declined to become involved in the USFS planning effort, at this time. Particularly in light of the new BLM Organic Act provisions, this seems an inappropriate decision.

19

Page 2

Accordingly, by this letter, I am requesting that BLM reconsider this decision. I urge you to engage in coordinated land use planning on this outstanding area, rather than allowing an arbitrary line on a map dictate your efforts.

Thank you very much for your attention.

Yours sincerely,

David Sumner

cc: Craig Rupp, USFS
James Mathers, USFS
Fred Harden, COSC Wilderness Workshop
Ted Tomasi, The Wilderness Society
Janet Goodnoe, University of Colorado Wilderness Study Group
William Kemsley, Jr., BACKPACKER Magazine

Exhibit D

19

IN REPLY REFER TO
CD-931
1608
6221

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

COLORADO STATE OFFICE
ROOM 700, COLORADO STATE BANK BUILDING
1600 BROADWAY
DENVER, COLORADO 80202

JUN 9 1977

Ms Janet Goodnoe
University of Colorado Wilderness Study Group
University Memorial Center
Boulder, CO 80302

Dear Ms Goodnoe:

This letter is in response to your April 8 request concerning the Bureau's management of the Pole Mountain area within the Montrose District, relative to the newly mandated wilderness review process. Unfortunately, this response has been somewhat delayed as you did not send a copy of your inquiry to the District Office.

Please be advised that our Montrose District office has been working closely with offices of the Gunnison and Rio Grande National Forests regarding utility corridors in this general area for the past two years. The District's planning coordinators met recently to discuss agency planning schedules in the Upper Rio Grande, Gunnison, American Flats area, as well as the North Fork, Grand Mesa, Muddy and West Elk areas. They are currently developing coordinated preparation plans on these areas.

You should also note that the Montrose District staff is working closely with the Gunnison-Grand Mesa-Uncompahgre and Rio Grande Forest Supervisors and their personnel to jointly study and analyze the area you mention as well as the Powderhorn Primitive Area - Cannibal Plateau area, West Central Coal and all other areas where we have identified concerns held in common between our agencies.

As you are no doubt aware, inherent in the development of our regional land use plans is the need for public involvement. Mechanisms for ensuring this input are an integral part of our planning process, which involves individuals and interest groups, as well as other agencies.

In regard to your proposal to conduct a study of the entire roadless area, you should note that fundamental to our review of study areas is the required inventory of areas having both roadless and wilderness characteristics; see Section 603 of the Federal Land Policy and Management Act (copy enclosed). Note that selection of study areas based on roadless criteria alone would not be completely responsive to the mandates of the Act.

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

19

2

We appreciate your interest in the planning and management of the public lands.

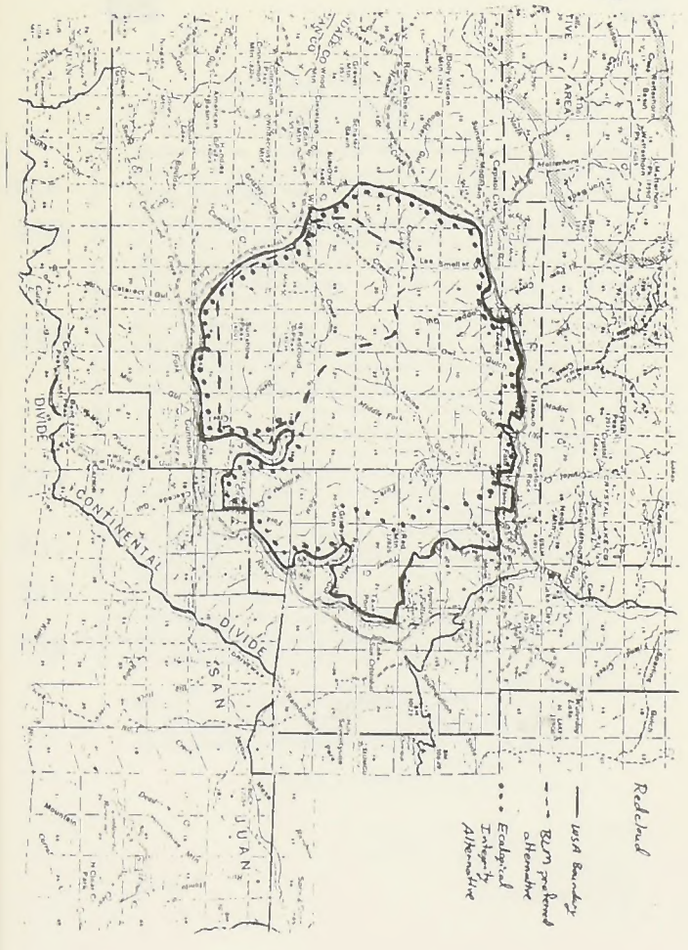
Sincerely yours,

DALE R. ANDRUS
State Director, Colorado

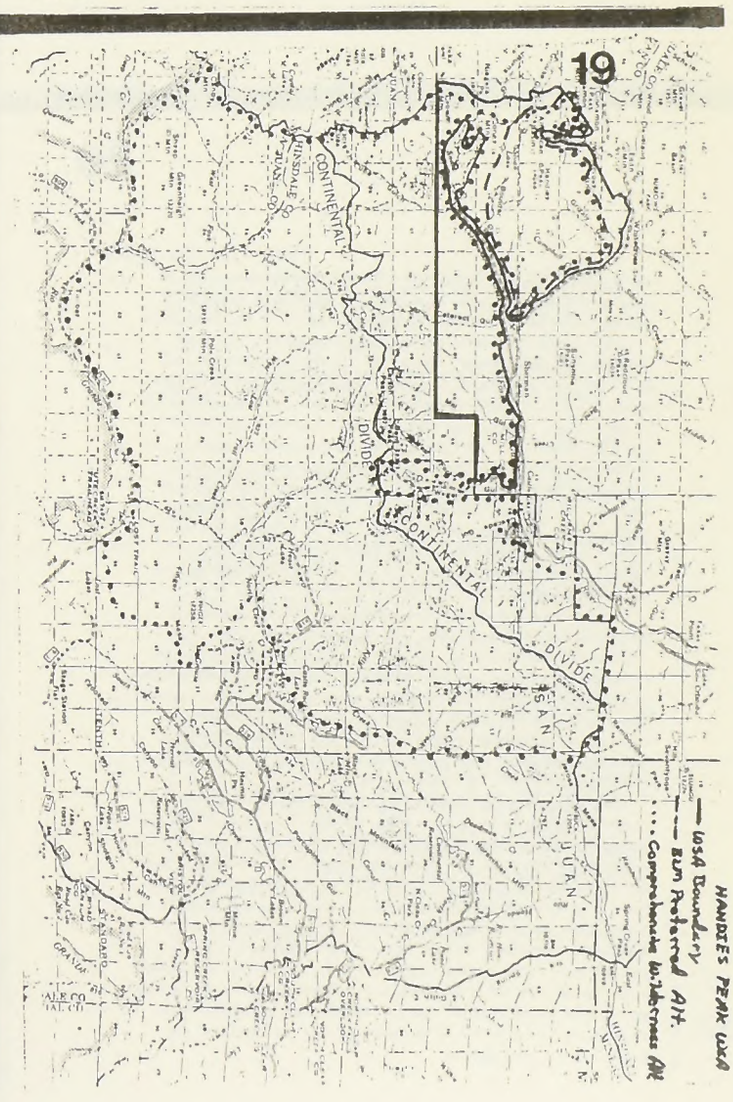
Enclosure

cc: Marlyn Jones, Montrose District Office
Craig Rupp, U. S. Forest Service

19



19



Reaponse to Comment Letter 19

19A One of the rationale we used in developing the various alternativea involved excluding landa that would be difficult if not impoaaible to manage aa wilderneaa. Non-federally owned landa certainly fit in that category due to the fact that BLM could not control uae of or accesa to those landa. See alao our previous reaponae to letter 16B.

19B The alternative which excludes the Red Mountain alunite deposit waa amended following acoping meetinga (aee Chapter 1) held in Auguat 1981. In meetinga with Earth Sciencea, Inc., the company that haa applied to BLM for a mineral leaae within the eaatern portion of the Redcloud Peak WSA, they proposed uae of Alpine Gulch aa a tranaportation and acceaa route. Since thia is the company's proposal we have used it aa the baaia for defining the alternative.

We have attempted to include a full range of alternativea for the Redcloud Peak WSA. Theae alternativea display varying degreea of wilderneaa and nonwilderneaa recommendatioaa. Thia waa done to, inturn, ahow the varying levela of trade-off between wilderneaa and potential development actiona. Although the Ecological Integrity Alternative doea not preciaely match up with any in the EIS, it ia aimilar to our proposed action and certainly falla within the range of alternativea we have addreaaed.

19C Valid exiating righta are eatabliahed by the diacovery of a valuable mineral deposit, not be staking a claim. Alao, the mineral industry ia generally aomewhat reluctant to expend exploration funda in an area where there ia a poaaibility that mining will be prohibited aa of a certain date unleaa economic reaerves are demonatrated.

19D During the atudy effort, BLM contacted the Forest Service and they indicated that no further wilderneaa atudy of the Caraon Peak Roadleaa Area (#02220) ia planned during the firat generation of Forest Plana. Caraon Peak haa been recommended for a Management Direction 2A with emphaaia on aemi-primitive motorized recreation opportunitiea. The BLM cannot require another agency to re-evaluate and atudy their landa for wilderneaa. Neither the U.S. Forest Service nor Congreaa recommended theaa landa for wilderneaa deaignation.

19E The queation of developing an alternative that includea large portiona of landa adminiatered by the Forest Service haa been addreaaed previoualy. Aa the proposed alternative relatea to the Handiea Peak WSA it doea not appear to be aignificantly different from the All Wilderneaa Alternative. Therefore, aa thia proposed alternative relatea to BLM, it ia within the apectrum of alternativea already addreaaed.

20

Arizona • Colorado • Idaho
Montana • Utah • Wyoming

National Audubon Society
ROCKY MOUNTAIN REGIONAL OFFICE
4150 DARLEY, SUITE 5, BOULDER, COLORADO 80303 (303) 499-0219

July 6, 1982

RECEIVED
JUL 8 82
B.L.M. Montrose Dist.

Montrose District
Bureau of Land Management
Box 1268
Montrose, CO 81401

Gentlemen:

The National Audubon Society appreciates this opportunity to comment on the draft EIS for the proposed Wilderness Study Area in the Gunnison Basin and American Flats/Silverton Planning Units.

Basically the EIS considers two types of areas: 1) Handies Peak and Redcloud WSAs, both large enough to comprise complete wilderness units in themselves; and 2) six small areas contiguous to sizeable Forest Service Wilderness areas. Our comments will be focused accordingly.

It is unclear why the Bureau is recommending so little of the Redcloud Peak WSA for wilderness designation. The alunite deposit on Red Mountain fails to justify such a skimpy (11,000 acres) recommendation. The EIS states that Earth Sciences, Inc. could develop their lease, should the deposit be confirmed, even if Congress designated all 40,000 acres in the WSA as wilderness (p. 72). Alpine Gulch is not the only access route to the site; an existing dirt road to the radio tower northeast of Red Mountain could be used, eliminating the expense of blasting a new road up Alpine Gulch. Impacts on soil, water quality, wildlife habitat, and wilderness and scenic values would be considerably less.

Outside of this one lease, the EIS cites only 25 patented mining claims within Redcloud Peak WSA (p. 36), although it mentions "over 900" unpatented claims (ibid). Exploration of mineralized areas is "still in the preliminary stages" and "no clearly identified areas for intensive exploration have been defined" (ibid). In short, we are presented with mostly vague intimations of mineral value, for which the known wilderness, wildlife, watershed, scenic and recreational values of three-fourths of

AMERICANS COMMITTED TO CONSERVATION
100% Recycled Paper

20

the area are to be sacrificed. The Preferred Alternative is termed a "minerals-wilderness compromise" (p. 79). In actuality it represents a complete capitulation to the mining interests, and is totally unacceptable.

The economic information supplied by the EIS doesn't justify the Preferred Alternative either. The dollar value of the minerals in this WSA is unknown. The fact that no one has yet determined that development would yield profits enough to justify an investment - after over 100 years of opportunity - suggests that these are marginal mineral deposits, with real problems of access and marketability. Certainly they are not vital to "National security" or crucial to the nation's economic well-being. On the other hand, the estimated 1980 value of recreation in the WSA is $137,000, not much less than the total mineral production of Hinsdale County in 1976. Although many resources - such as wilderness and scenic values - cannot be defined strictly in monetary terms, such economic analysis as the EIS gives supports the idea that Redcloud Peak should be designated wilderness.

The Redcloud Peak WSA is characterized as possessing "outstanding scenic quality" (p. 25), extensive elk and bighorn sheep summer range, "outstanding opportunities for solitude" (p. 33), abundant wildlife, and scientific, educational, geologic and ecologic values. The "adverse impacts" of wilderness designation on access to state-owned minerals and private inholdings (Table 4-1) can be alleviated by land trades, purchase, or easement. In recognition of these facts, we urge that the 37,5000-acre "wilderness manageability alternative" be adopted instead of the abortive "Conflict Resolution Alternative II".

The same points can be made for the Handies Peak WSA. Again a small, "token" wilderness is being recommended, for reasons that are unclear but evidently have to do more with suspected mineral deposits in the area than with anything else. Again we stress that the wildlife, watershed, scenic and recreational resources of the area are - as the EIS makes abundantly clear - far more valuable than the evidently marginal mineral deposits thought to be present. The difficulties presented by uncertain markets and rugged, inaccessible (to now) terrain suggests that such deposits - if they are there - will remain uneconomic to mine, just as they have always been. However, the EIS fails in any case to compare prospects for development in both Handies Peak and Redcloud Peak WSAs with the situation in other mineralized districts, so we cannot tell for sure just what the probability of development is.

20A

20

The other six WSAs are fairly small, but would make good additions to existing wilderness. The EIS details the scenic splendor provided by American Flats, Weminuche Contiguous, Whitehead Gulch, and Needle Creek. Again the Bureau's reasons for recommending less than the total acreage for wilderness are unclear. Private inholdings and state mineral claims can be settled by land trades, easement, or purchase. Grazing and timber values are low, wildlife and recreation values high. Mineral potential is unproven, but access is difficult in any case. The summary in Table 4-1 suggests strongly that designation of the total acreages of these four WSAs as wilderness is justified.

Bill Hare Gulch and Larson Greek would be valuable as additons to the Big Blue Wilderness area. The EIS gives no reasons why they should not be so designated and states that "designation of this WSA could enhance the wilderness values and manageability of the contiguous Big Blue Wilderness Area" in both cases (p. 89, 91).

In summary, this EIS recommends very little land for wilderness designation, for no clearly-defined reason. On the other hand, by recommending such scanty acreages, BLM ignores factors such as:

1) The opportunity for watershed protection, at a time when clean water is becoming scarcer;
2) The need to maintain wildlife habitats, at a time when these habitats are being destroyed at an unprecedented rate;
3) The opportunity to preserve a wilderness resource in the face of rising (10% annually) demand for wilderness-based recreation.

To remedy the short-comings of the EIS, we recommend it be substantially re-written. The facts it presents certainly do not justify BLM's recommendations. Instead, we urge that at least the following areas be recommended for wilderness designation:

- 37,500 acres of Redcloud Peak WSA, including Alpine and Owl Gulches.
- All of the Handies Peaks WSA
- All of the American Flats, Weminuche Contiguous, Whitehead Gulch, and Needle Creek WSAs.

Thank you again for the opportunity to comment.

Sincerely,

Pauline D. Plaza

Pauline D. Plaza
Regional Representative
PDP:glt

Response to Comment Letter 20

20A Additional information has been included in Chapters 2 and 4 to better identify the mineral potential of each WSA. In addition, in the final EIS we have attempted to project the level of mineral development that is most likely to occur. Given the lack of specific information on which to base these predictions they are only speculative in nature. Potential would have to combine with other factors such as economics and demand at some point in order for actual development to occur.

21

Uncompahgre Resource Council
P.O. Box 781
Montrose, Colorado 81401
249-5773

July 7, 1982

MR. Henri Bisson
Project Manager
Bureau of Land Management
P.O.Box 1269
Montrose, Co.81401

Dear Sir:

Following are comments on the Gunnison Basin-American Flats- Silverton Wilderness Draft Environmental Impact Statement.

Of major concern to the Uncompahgre Resource Council membership are the evaluations of impacts to water quality, wildlife habitat, and recreational values resulting from non-designation of the WSAs listed in the DEIS. We feel these impacts were given insufficient weight. It is obvious that designation of the WSAs as Wilderness Areas would be very beneficial to the above-mentioned resources, as compared to non-designation. The DEIS does not make this clear. Non-designation would inevitably result in harmful impacts, possibly severe.

21A 1. Even if mining development does not occur,(an unlikely scenario) motorized use and other development would cause erosion of fragile soils, disturbance of wildlife, and negative impacts on primitive recreation. Mining development would increase the severity of these impacts. We feel that the DEIS does not seriously evaluate these losses.

21B 2. At present, the Interim Management Policy precludes motorized use or roads improvement within the study areas. Loss of this protection will undoubtedly cause degradation of soils and water quality, since many ORV users perceive a challange to their skills in blazing new trails. Often these trails are in the worst possible location, viewed from the standpoint of erosion control.

21C 3. The table in the DEIS labeled "4-1" (p.104-117) lists "Irretrievable, Irreversible commitment of resources". In column 4, it should also list watershed quality, wildlife habitat, and primitive recreation as being irreversibly affected by non-designation.

21D 4. Impacts on wildlife should be evaluated with the help of the lead agency in this field, e.g., the Colorado Division of Wildlife. Possible development scenarios could be presented to the D.O.W. and their estimates of impacts solicited. (For instance, impacts of 4 miles of road and one 40-site campground with projected use level of 2000 RVDs per year.) Several levels of use should be estimated.

(Incidentally, this method would also be very useful to the public in visualizing effects of various levels of development, such as: 1 ski area with lodge and parking lots; or, 1 300- employee mine with tailings piles, settlement ponds, and mill.)

21E 5. We sympathize with the difficulties of any agency trying to estimate recreational use and values. Nonetheless, economic benefits to both local and area economies should be more carefully considered. Recreational users will usually purchase meals, equipment, fuel, and supplies from local sources, adding a substantial boost to the area's economy.

21F 6. Recreational use of Wilderness Areas is unquestionably higher than known figures because many users do not register with any agency, even when trail registers are available. In the experience

21
Uncompahgre Resource Council
P.O. Box 781
Montrose, Colorado 81401
249-5773

21F of our group, the BLM estimate of 35% more use than available statistics is conservative in the extreme. The references on p. 35 of the DEIS confirm this.

21G 7. The numbers of RVDs reported by Colorado Outward Bound Schools (p.34) for the Redcloud Peak WSA are far higher than the total RVDs shown on p.35. This error is repeated in several other WSA reports.

21H 8. No rationale is given for Appendix 4.5, which shows no primitive recreation opportunity in any of the WSAs except Redcloud Peak. This is in contradiction to the text of the DEIS. In chapter 3, "Affected Environment", under the headings "Wilderness Resource", all 8 WSAs are described as having opportunities for primitive recreation. From the personal observations of our group, we must agree with the text, and concludes that Appendix 4.5 is in error.

9. Appendix 4.5 also lists "semi-primitive motorized", "roaded natural", and "rural" recreation opportunity classes. These are irrelevant to Wilderness recreation.

10. It also includes the statement that "Users can achieve only limited variety of recreational experiences in these WSAs." The statement is untrue and biased.

21I 11. According to BLM Wilderness Study Policy (Federal Register, Vol. 47, No. 23, 2-3-82, Chapter III, Section C),"Site specific analysis will be necessary whenever partial wilderness alternatives are formulated. ...analysis...must be specific to geographic location within the WSA." The DEIS fails to analyze impacts to specific geographic locations outside the preferred area for all 8 WSAs.

21J 12. Also, in the study policy (Chapter II, Section C), it is stated, "In applying the managibility criterion, the BLM will carefully assess potential impacts of providing access to non-federal inholdings and the likely development of such uses or inholdings." This was not done for any of the 8 WSAs.

21K 13. The DEIS does not mention which potential minerals are "critical or strategic", which is also mandated by the study policy.

21L 14. Nor does the DEIS consider "The degree to which the resource is present on other public and private lands outside the WSA." We feel this omission is very important, in relation to minerals especially, and hope it will be corrected.

In conclusion, we are sympathetic to the difficulties of assessing what are often nebulous impacts, and the trials of working under an administration so antagonistic to conservation of resources. We commend you and your project team for your monumental efforts and for a well-done document.

Sincerely,

John R. Baldus
Uncompahgre Resource Council
Wilderness Coordinator

JB:djs

Response to Comment Letter 21

21A We have attempted in the Final EIS to better predict potential activities that would occur under each of the various alternatives. The descriptions of these actions or activities are detailed in Chapter 2 and the potential impacts are discussed in Chapter 4.

21B Motorized vehicle use is regulated according to the Off Road Vehicle Management Plan for this area. This plan will continue to restrict motorized use to existing roads whether or not the individual area is designated wilderness. Except for the roads that have been cherry-stemmed, all ways within the WSAs are closed to motorized vehicles.

21C These impacts have been addressed as appropriate in the Final EIS.

21D Wildlife biologists within the BLM are fully qualified to analyze impacts to wildlife. The Division of Wildlife was consulted in preparing the EIS. In addition they have provided comments on the DEIS (see comment letter 9).

21E Projecting where recreation money will be spent for a yet undesignated wilderness area is highly unreliable. A more rational approach to recreation value is "willingness to pay". Willingness to pay isolates the value that a recreation user places upon the use of a particular resource. Willingness to pay values are used in this study for all recreation figures (see Appendix 4).

21F It is realized the 35% figure could be low, however this was an average of several wilderness and primitive area studies related to the number of visitors who registered.

21G The reason why RVD's reported by Colorado Outward Bound School are higher is that these RVD's are for the Redcloud Peak area and adjacent lands, while RVD's for Sunshine and Redcloud Peak are stated just for climbing use figures, not daily recreation use data.

21H As stated on pages 26 and 27 of the DEIS, the WSAs were classified in terms of a spectrum or continuum of available recreation opportunities (ROS). The definitions used in the naming of the ROS classes are not reflective of, nor are they synonomous with, the definitions of primitive or wilderness used in the Wilderness Act or FLMPA. The classifications merely depict relative types of experiences available to users, irrespective of any given WSAs suitability under Wilderness Act criteria. From an ROS perspective, what is important are the types of recreation experiences available in each ROS zone,not the name chosen to describe each. Various primitive types of recreation are known to exist in up to four of the six ROS classes.

21I The Final EIS addresses impact to the suitable as well as nonsuitable portions of each WSA.

21J The likelihood of development and the impacts of access to private inholdings is addressed in the Final EIS. Access to private land is uncorporated in the discussions of mineral development as this is what access is projected to be needed for.

21K See our previous response 18C.

21L The entire discussion relating to mineral production in the general area of all the WSAs on page 26 of the DEIS (Chapter 3, Common Resource Value) relates to the mineral resources outside of the WSAs. Very little, if any, of the production of this region came from within the WSAs; developed areas were excluded or cherry-stemmed out during the inventory phase.

22

AMERICAN WILDERNESS ALLIANCE
4260 East Evans Avenue • Suite B • Denver, Colorado 80222
(303) 758-5018

RECEIVED
JUL 12 '82
B.L.M. Montrose Dist.

BOARD OF TRUSTEES
Sally A. Ranney
W. Mitchell
Nancy J. Botta
Dr. Bernard Shanks

BOARD OF ADVISORS
Dr. John Craighead
L.W. (Bill) Lane, Jr.
Francois Leydet
Martin Litton
Dr. Roderick Nash
Margaret Wentworth Owings
Eliot Porter
James A. Posewitz
Wallace Stegner

Executive Director
Clifton R. Merritt

Editorial Offices
Wild America
William A. Schneider
Town
324 Fuller
Helena, Montana 59601

July 7, 1982

Wilderness EIS Team
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Dear Sirs:

The American Wilderness Alliance, a western-based, national conservation organization, has long been involved and interested in the wilderness study process of the BLM. We feel that many of the designated study areas in Colorado would make fine additions to the National Wilderness Preservation System.

Many of these areas are to be considered in the American Flats-Silverton Environmental Impact Statement. While the Alliance has submitted its comments and recommendations at several junctures in the study, it would like to submit the following for inclusion in the official record on the subject.

Our comments as to the support for different "alternatives" are based on the scheme of alternative management proposals which was used early in the study process. If the administering of the alternatives or the labeling has changed, it is hoped that our use of the dated system will not be confusing.

We appreciate the opportunity to comment on these wilderness study areas and the opportunity to be involved in the study process. Please keep us informed of further developments and opportunity for involvement.

Sincerely,

Jeff Rennicke
Field Representative

enclosures

"We Don't Inherit the Earth from our Ancestors, We Borrow It from our Children."

22

AMERICAN WILDERNESS ALLIANCE RECOMMENDATIONS

1. Bill Hare Gulch (Area #CO-030-085) - The American Wilderness Alliance supports full wilderness designation for the entire 350 acre Bill Hare Gulch area. Predominately of wilderness character, the area contains no private inholdings, leases or mining claims. Topographically, the area is a natural and logical extension of the established Big Blue Wilderness, The opportunities for solitude and primitive recreation would add value to those already existing in the Big Blue. Alternative C is not acceptable. An area of wilderness quality should not be excluded for the sake of boundary neatness. The American Wilderness Alliance supports Alternative A.

2. Larson Creek (Area #CO-030-086) - The American Wilderness Alliance supports full wilderness designation for the entire 880 acre Larson Creek area. The area serves as a point of access and logical extension to the established Big Blue Wilderness. No private inholdings, leases or mining claims exist within its boundaries. The lack of areas requiring rehabilitation would aid in management of the area as wilderness. Alternative C is not acceptable as the existence of an old way and cabins do not impair the area's qualifications as Wilderness. The American Wilderness Alliance supports Alternative A.

3. American Flats (Area #CO-030-217) - The American Wilderness Alliance supports full wilderness designation for the entire 3,400 acre American Flats area. It serves as a point of access to and a logical extension of the Big Blue Wilderness. The area is one of the few examples in the lower 48 states of alpine tundra ecosystems on lands under the jurisdiction of the BLM. Its addition would enhance the variety of ecosystems represented in the Wilderness System. The area is habitat for both the Altia Starwort (Stellaria irrigua) and the Porter's Groundsel (Senecio porter) which have been proposed for addition to the Federal Register list of Endangered and Threatened Plants. Alternative C is not acceptable, due to the minimal nature of the existing claims and the small impact of developments. The American Wilderness Alliance supports Alternative A.

4. Redcloud Peak (Area CO-030-208) - Due to the existence of the Earth Science, Inc., mineral lease of the Red Mountain area, the American Wilderness Alliance recognizes the management difficulties involved in a full wilderness designation. Therefore, the American Wilderness Alliance supports Alternative D. This is the only alternative which allows for both the development of high potential areas and the protection of an area of approximately 30,000 acres of high wilderness quality. This 30,000 acres would protect not only important summer range for elk but one of the few year-around habitats of bighorn sheep on lands in Colorado under BLM jurisdiction. While the eastern boundary deletions are sufficient to allow for the mining operations, the western boundaries serve to protect this vital wildlife habitat, as well as important watershed and recreation values. Alternative D encompasses the minimum acreage and boundary designations which would allow for the maximum management of both uses.

22

5. Needle Creek (Area #CO-030-2298) - The American Wilderness Alliance is in full support of the BLM-Forest Service land exchange involving the Needle Creek area, provided that the entire area retains its current WSA status. The area is a natural and logical addition to the existing Weminuche Wilderness and is of high wilderness quality. The significant acreage of contiguous lands involved provide outstanding opportunities for solitude and primitive recreation. The American Wilderness Alliance supports Alternative A.

6. Whitehead Gulch (Area #CO-030-230B) - The American Wilderness Alliance is in full support of the BLM-Forest Service land exchange involving the Whitehead Gulch area, provided that the entire area retains its current WSA status. The area is a logical and valuable extension of the existing Weminuche Wilderness Area. It contains the western extent of the Grenadier Range, including Mt. Garfield. Alternative D does not provide an adequate addition and Alternative C excludes lands to the north which are of predominantly wilderness value. The American Wilderness Alliance supports Alternative A.

7. Weminuche Contiguous (Area #CO-030-238B) - The American Wilderness Alliance supports full wilderness designation for the entire 1840 acre Weminuche Contiguous area. The area is a natural extension of the existing Weminuche Wilderness and is of high wilderness quality. It contains the habitat of Altia Starwort (Stellaria irrigua), which has been proposed for the status of endangered on the Federal Register list of Endangered and Threatened Plants. Alternative C does not encompass all of the lands which make the area such a valuable addition to the existing Wilderness. The American Wilderness Alliance supports Alternative A.

8. Handies Peak (Area #CO-030-241) - Due to the obvious management difficulties involved with the existence of major mining activity near a wilderness area, the American Wilderness Alliance supports Alternative C, for a 6000 acre Handies Peak Wilderness. The area encompassed includes areas of high wilderness qualities and excludes areas of high mining activity.

23

July 11, 1982
Box 1148
Crested Butte, Co 81224

RECEIVED
JUL 15 '82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
PO Box 1269
Montrose, Co. 81402

Dear Mr. Bisson,

Although these comments are just a few days late, I hope they are soon enough to be included in the FEIS for the Gunnison Basin/American Flats-Silverton WSA's.

I congrstulate the BLM for recommending any wilderness at all, as I know that the present Administration in D.C. is against almost all new wilderness.

American Flats does indeed need at least some protection. It is the headwaters of Cow Creek, and Cow Creek (within the Big Blue) is perhaps the wildest place in Colorado. Though the creek is not remote--Ouray is close by--it is extremely inaccessible. I've been there. It's the kind of place few persons visit because of the difficulty of movement there. And it's the kind of place one would expect to find the purest of waters. To protect this purity, the entire watershed should be designated wilderness. Larson Creek and Bill Hare Gulch are also important additions to the Big Blue, especially in light of their absence of resource conflicts.

One thing I did not like in the DEIS was the statement on p. 89 that, "Sentiment in the region tends to be against any more wilderness designation....a fear of being surrounded by wilderness." If you are talking strictly of Lake City, then this is true. But Gunnison County can be legitimately considered to be "in the region" and there are many here who favor much more wilderness designation, and enjoy being surrounded by wilderness.

23

In light of the water quality problems in the Animas River, I support the All-Wilderness alternative for Whitehead Gulch and Weminuche Contiguous, and support the BLM in its preferred recommendation for wilderness for Needle Creek. Congress has specified watershed protection as a prime reason for wilderness designation, and I cannot think of a better application of this principle than the Animas. Major towns, including Durango and Farmington, N.M. downstream, drink this water, which begins its journey out of the mountains flowing from mines and mining districts. The Animas needs all the clean water additions it can get. I see that the Wilderness Manageability Areas alternative leaves out many key drainages in Weminuche Contiguous and Whitehead Gulch. These must be included.

I believe the possibility of alumina mining on Red Mountain in the Red Cloud Peak WSA as very remote. There are much better, more accessible deposits elsewhere. Electricity in the region is not yet expensive, but it is hardly the very cheap power which the aluminum industry always seeks, and this electricity is likely to increase in price rapidly in the near future. Furthermore, since the claims are already staked, the mining companies can get to the area with very few restrictions. The only difference

23A

wilderness designation would make would be that the companies could not patent the land, and this is good. Therefore, I

23B

support an alternative, not mentioned in the DEIS, that would include the western half of Red Mountain(leaving the eastern half open for access) and all of Alpine Gulch. The border would run across the top of Red Mtn. and across the top of the 11,578 foot peak in Section 7 northwest of Red Mtn.

I believe the BLM's Handies Peak recommendation would make sense, if the Forest Service Carson Peak roadless area were not next door. Since this Forest Service de facto wilderness area

23

is next door, the two should have been, and still should be, studied together. Perhaps Congress will be persuaded to overcome whatever inter-agency problems exist, and these two will be studied as one in the future.

Thank you for this opportunity to comment. Please keep me on the mailing list. Also, please include me on the mailing list for all other BLM wilderness area planning in the Montrose District, including especially the Cannibal Plateau Contiguous areas and Powderhorn Primitive area studies.

Yours truly,

Gary Spring

Gary Spring
Chairman, Gunnison County Friends of the Earth

Response to Comment Letter 23

23A The alunite deposit is not subject to location of mining claims and subsequent patent, but to the mineral leasing laws as discussed in Chapter 3 in the Mineral Resources section under Redcloud Peak.

23B See Response 19B.

24

Colorado Wilderness Network

9239 East Colfax • Denver, Colorado 80206 • 573-7870

RECEIVED
JUL 15 82
B.L.M. Montrose Dist.

Mr. John Sering or Mr. Henri Bisson
Gunnison Basin BLM Resource Area
336 S. 10th St
Box 1269
Montrose, Co. 81401

July 7, 1982

Dear Mr. Bisson & Mr. Sering,

Enclosed is a copy of a statement written by the Colorado Natural Areas Program to the effect that several species of plants "of Special Concern" could well be found in the Handies Peak and Red Cloud Peak WSA's.

I hope it is not too late to include this document in the record of public comments on the Gunnison Basin DEIS.

Respectfully Yours,

Rosalind McClellan

Rosalind McClellan, Colorado Wilderness Network
Adopt a BLM Wilderness Coorindator

Aiken Audubon Society • Arkansas Valley Audubon Society • Aspen Wilderness Workshop • Colorado Association For River Preservation • Colorado Mountain Club • Colorado Open Space Council • Colorado Trout Unlimited • CU Wilderness Study Group • Denver Alpine Club • Denver Audubon Society • Environmental Research Group • Friends of the Dolores River • Friends of the Earth • Gunnison Wilderness Society • High Country Citizens' Alliance • Public Lands Institute • San Juan Ecological Society • San Luis Valley Wilderness Coalition • Sierra Club • Southeast Colorado Wilderness Coalition • The Wilderness Society • Two Rivers Citizens' Association • UNC Colorado Public Interest Research Group • Uncompahgre Audubon Society • Upper Arkansas Wilderness Coalition • Western Colorado Resource Council • Wilderness Workshop

100% Recycled Paper

24

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM
Department of Natural Resources

Natural Heritage Inventory
1550 Lincoln Street, Room 110
Denver, Colorado 80203
Phone: (303) 866-5887

Richard D. Lamm
Governor

D. Monte Pascoe
Executive Director

Carol J. Pustmueller, Ph.D.
Program Director

MEMORANDUM

REPLY FOR
INVENTORY DATA REQUEST

TO: Carae Pustmueller DATE:
FROM: J. Scott Peterson, Botanist
Beth P. Lapin, Zoologist
William L. Baker, Plant Ecologist

Plant Communities (PC) Special Animals (SA)
Aquatic Ecosystems (AQ) Geologic Features (GF)
Spacial Plants (SP)

REQUEST NO. 103 PROJECT: Colorado Wilderness Network/BLM WAS's

SPECIAL PLANTS:

None of the WSA's are known to contain any taxa of national or potential national significance. This statement is based upon the fact that none of these areas have been surveyed to any degree for Special Plants. With the lack of knowledge regarding the flora on some of these areas, it would not be improbable to state that ~~previously~~ unknown taxa might occur there. Various plant species of Special Concern that could be found here include the following:

24A

050-014+017	Upper & Lower Grape Creek	Penstemon degeneri USFWS Category 2; Colorado Endemic
		Eriogonum brandegei USFWS Category 2; Colorado Endemic
030-208+241	Handies & Red Cloud Peaks	Cilia pentatemonoides Colorado Endemic
		Astragalus microcymbus USFWS Category 2; Colorado Endemic
010-003	Skull Creek	Penstemon yampaensis USFWS Category 2; Colorado Endemic
010-007A+007C	Black Mt. & Windy Gulch	Astragalus detritalis Regional Endemic

IN COOPERATION WITH

Response to Comment Letter 24

24A See our previous response to comment 8A.

25

colorado outward bound school

945 PENNSYLVANIA ST. • DENVER, COLORADO 80203 • (303) 837-0880

July 8, '82

RECEIVED
JUL 15 82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, CO

Mark Hesse
C.O.B.S.
P.O. Box 153
Lake City, CO
81235

Dear Mr. Bisson:

I am presently serving as Course Director for the Colorado Outward Bound School in the North San Juan Mountains near Lake City. The summer program which I am overseeing is being conducted in the Uncompahgre and Gunnison National Forests, the site of three Wilderness Study Areas, namely Redcloud Peak, Handies Peak, and American Flats, presently under consideration by your agency.

I have asked the students who were in attendance on the June course to provide public comment on the issue as to what parts of the areas should be set aside as Wilderness Areas. The average age of the students is 17. Despite the abundance of grammatical errors and the confusion on many of the students part as to who to address the letter to, I do believe that the enclosed letters reflect a genuine concern for the future of these areas. I would appreciate it if you would hold them as comment.

Thank you.

Sincerely,

Mark Hesse

Mark Hesse

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

June 29, 1982

Dear Sirs,

I am presently enrolled in the Colorado Outward Bound. My patrol this just spent 22 days hiking through at least three proposed wilderness tracts; Redcloud peak, Handie's peak and the American Flats. Of these three, It is my opinion they all should be set aside. Since this is probably, unlikely, I feel the Redcloud peak area is the most important of them.

The Redcloud peak area was my introduction to the Rocky Mountains. Being from Bermuda, I had never seen the high mountains of this area. My initiation was breathtaking. I could never hope to explain the impact these mountains have had on me and my appreciation of nature in general. To take this chance away from other peoples would be a great tragedy.

When I go home I will try and tell my friends what I have seen and the things I have done. It will be hard. Yet hopefully I will convince them to come out here and see all of this for my self. How can they do that if the country side is being destroyed for minerals. I will they be able to enjoy the peace and serenity I have enjoyed when there are two ton mining trucks lumbering over such places as cumnican and engineer pass. I dont think so. I also dont think anyone has the right to take the chances I've had away from my generation or the ones to follow.

I would like to return to this area in a few years. maybe I would return with my children. In 20 years. The way things look now I may never get another chance to see the Redcloud peak area the way I did this summer. I would very much like to see this area preserved at all costs. Even if it means not mining any minerals. The minerals would be used up in 10 years, but nature will always be here. Why ruin it for everyone?

Thank you for looking.

Yours Truely
Ben Hopkins.

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

ear Sirs,

I have spent 23 days in the North San Juan Mountains and wish to inform you that if it is to be destroyed at all, it is a big mistake. Red Cloud area is one of my favorite ~~areas~~ area mainly because I spent most of my time there. I very much wish that it could stay like it is so someone else can experience the same as I did.

Mining, I realize is very important, but I ~~still~~ feel that people being able to get away from the hussle and hussle of the city is very important too. I really wish that you could leave at least the Red Cloud area the Same.

Sincerly Yours
Denny
Midgorden

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

Dear Sir - In consideration of Rare II Wilderness Bill

I would like the Gunnison Basin and American Flats-

Silverton Wilderness, Study Area Bill to be passed so the greatest amount of land be made into wilderness, for the purpose of preserving the land. As mining Areas around wilderness impact into areas of wilderness by pollution such as wastewater, food lines ect. Hunting, Fishing and ~~No~~ Keeping in scenic areas will not continue because of the destruction of land and its Ecosystems. Storage and Patterage of water then forest ecosystems holding snow will also be affected by mining. With the Bill saying Only Alpine Areas Aprox Above 11,000 Ft to be wilderness areas And what good is the top of the mountain without the base, Letters like this, I Believe will help preserve wilderness areas. But By your reading this there is no way you can truely get to know what I am talking about. I was in Red cloud & sunshine peak area and also handies area for 21 days and the comparison to did mines around really mess up the area. you really need to see the differences for yourself. I believe you would want to leave it wilderness

~~thank~~ you
Mike Wayne Black
MIKE WAYNE BLACK

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

Dear Sir - In Consideration of Rare II Wilderness Bill of Co.

I have just completed an Outward Bound Course in the Red Cloud Peak area. I have been told that this area is to be turned into a mining facility. If the Rare II Wilderness Bill of Co. is not passed the area would be destroyed. I feel that the Red Cloud Peak area should be maintained as a wilderness area for the sake of all who are involved.

The mines would foul up the pure water system, and create a big eye sore for the people of Southern Colorado.

So to sum it all up I think that the mining should be done some where else if at all possible, for my self and the people of The United States.

Thank you,

Kevin Christopher Elliott

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

6/29/82

Dear Sirs.

In consideration to the RARE II wilderness bill - Colorado, I've just recently spent a three week trip backing country with Outward Bound, & feel very fortunate for the opportunity to experience this beautiful part of our country. A good deal of the hiking we did was in the Red Cloud, Handies, Peak area, & understand that a great deal of mining is to take place if the bills of the bill are signed. This ridiculous mining plan would have many underlying effects, not directly related to the area being mined. For example, destruction of wildlife, disturbing the ecosystem and food chain. This would wipe out many species of animals which use this land for their home. As for aquatic life is concerned, the removal of the trees would disturb the filtration system in which many impurities would enter the the surrounding streams, lakes, etc, again upsetting the foodchain and ecosystem. This "beautiful land in which the area details should be preserved in the wilds and not stripped of its resources.

Sincerely,
Paul L. Curtis

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

Dear Sir - In consideration of RARE II wilderness bill,

It is to my understanding that a bill is being proposed to turn the Gunnison Basin and American Flats/Silverton land area into a Wilderness area. For the past 21 days I have been staying on this land on an Outward Bound Course. I feel very strongly about having this area being an area of primitive recreation for hikers, hunters, fishermen, and jeepers. With the declining amount of wilderness area in the world, I find private property to be a great source of destruction to potential wilderness areas. Destruction not only to man but to the whole ecosystem of the surrounding land. The Gunnison Basin and American Flats/Silverton area is very beautiful and leaving this land to the responsibility of private owners would definately destruct most of the land and leave the area beyond use for primitive recreation. I personally would feel a great loss if this type of thoughtless, inconsiderate behavior was allowed to continue. I urge you strongly to turn the Gunnison Basin and American Flats/Silverton into a wilderness area.

Sincerely,
Doug Hagman (6/29/82)

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

To whom it may concern, in consideration of the RARE II wilderness bill - Colorado.

My name is Mark Franks, for most of the month of June I have been hiking with a group of young people form Colorado Outward Bound School through the southwest corner of Colorado. The area that have been hiking through is under study by the BLM to decide whether or not they should classify it as a wilderness area and how big of a wilderness area. The area I'm going to talk about is the Redcloud-Sunshine peak area. There is every sort of terrain, vegetation and animal life that you could think of in this area. I don't know if you've ever been around this area, but it is an awesome and beautiful place. The way that the light plays along the crags and scree of Sunshine peak in the evening in just breathtaking and it's so strangely beautiful to see a three-quarters moon rise over the peak while the sun is still shining.

This is why that I & my outfit will all disappear if the Gunnison Basin & American Flats/

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Silverton Wilderness Bill is not passed and the mining and oil companies are allowed to do their bussiness along and throughout this area. I have seen the slag heaps and the destruction caused by even the limited mining that is being done in the Redcloud-Sunshine area, and it disgusts me how anyone, even for money, could destroy such a gorgious area. I hope that this letter will have some impact on your decision on the amount of wilderness to be included in this bill (that the boundary will be larger). If you have a chance to come out the Redcloud-Sunshine area before you decide on any form of this bill I would suggest that you do.

Yours Sincerly,
Mark Franks

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

I have hiked up to Handies Peak and back down and personally believe the area should be left as wilderness area. I understand you wanting to mine there for the minerals alone, and am all for it but a different place would be better. I think you can find better places to mine in less attractive places such as right below Cooper Lake. Handies Peak is just a gorgeous site, you can see everything from up there as Slone Lake and Uncompregre Peak. As I have said I have nothing against you mining in some parts of the North San Juan Mountain Range but I personally think the Handies Peak area could be left alone.

Thank you
Jose Garcia

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

In the [illegible] management
[illegible]
[illegible]
[illegible]

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

Randy Rozzell

Dear Sir's

Hands peak [redacted]

I think that Hands peak circa should not be for mining Because I spent some time in that circa And it was Beautyful Oh man it was so pretty I saw some elk And all kind's of wild life But I saw the pretty est wild life By the lake Hands peak is very pirtty And should not be for mining at all.

Some people say that there is going to Be mining in smetter Gulch. i realy Don't think that should happen. when you come out here And camp plus rock clim in these Beautyful mountain's it give's you time to get away from city life. And you can do wonder's out in these mountain's. But most of all the sight's you see are something you probbly Don't see except for post card's. come out here and clim these pretty sight's. when i climed to the top of matter horn and weather horn it was so pretty you could see for miles and miles that is something you would have to experience for your self But you can't Because you don't have the will power to do that. that's why I came to Outward Bound.

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

Because they can show you live And to tell your life in the mountain's

it's very special

Why Don't you come to Outward Bound and find out for your self

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

6/20/82

Dear Sirs—

I am writing this letter to you from a tarp shelter in the Colorado Rockies. I am a student in the Outward Bound Program It has come to my attention that some of this land in the North San Juan area has come up for assesment by Congress and up for bid by mining companies. I would like to call your attention to the American Flats area, which is a proposed wildeness area addition to the National Forest Service's Big Blue Wilderness area. I have travelled extensively

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

in this area and it is a beautiful and awe-inspiring area for back-packers and horseback riders. If this area were opened to mining and Jeeping, it would be defaced and even dangerous. There are plenty of designated areas now open, and mining can thrive very nicely on its resources elsewhere.

With the growing population people need some places to get away. Fewer and fewer places are open, and I think that this particular place would be an excellent area for this opportunity.

Please consider my views.

Thank you.

Sincerely yours,

Will Gilbert

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

Dear Sirs

I'm sighting to you concerning the proposed Wilderness Area's, in the San Juan Mountain Range. I feel that the Handies peak range should be a wilderness area. I have campedt been to the sumit of Handies peak. I enjoyed it very much. The other proposed wilderness, Redcloud Peck, should also be a wilderness area. The only thing is that it's to small of a wilderness area to injoy it to the fullest. I feel that you should include Lee Smeter Gutch Apine Gutch + East Fork Gutch. I have campedt been to the sumit of this area to. Other People as my self should have the opportunity to injoy this area as I have, without

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

the destruction of mining going on. There are to many mining area's then there are wilderness area's + that's disgrasefull. These beeatyful forest are shinking ever year do to mining, pretty soon there won't be any natural area's left. I just one small tax payer who cares what happens to this beeatyful area.

Chris [illegible]

25

Colorado Outward Bound School
945 Pennsylvania Street • Denver, Colorado 80203 • 303-837-0880

DEAR SIRS:

I AM A STUDENT WHO HAS JUST COMPLETED A 23 DAY OUTWARD BOUND COURSE IN THE COLORADO ROCKIES. IT HAS COME TO MY ATTENTION THAT THE AMERICAN FLATS IS A PROPOSED WILDERNESS AREA. I TRAVELED ABOUT FOUR DAYS THROUGH THIS AREA AND NOTICED HOW DESTRUCTIVE JEEP TRAILS ARE. BY DESIGNATING AMERICAN FLATS AS A WILDERNESS AREA A LOT OF THE NATURAL BEAUTY THAT I PERSONALLY SAW WILL BE PRESERVED

SINCERLY,
Peggy Ann Samwell
PEGGY ANN SAMWELL

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

colorado outward bound school
945 PENNSYLVANIA ST. • DENVER, COLORADO 80203 • (303) 837-0880

Dear United States,

I am an ardent backpacker, climber and explorer of Colorado's mountain country. It has been brought to my attention that the Redcloud Peak area is a source of debate. You are trying to decide whether this region open to mining or national wilderness area. I see the need for limited access to minerals but some of these propositions call for the possible destruction of vast wilderness acreage. The worst aspect of this is that the most profitable and effective method [illegible] would be open pit mining, a process which leaves huge, permanent open scars on the land.

I am actually writing this letter in a Pitched Camp somewhere in these accursed mountains. It terrifies me to think that most of the people who will decide the fate of this land have never had such an experience. I [illegible] they did, I think they would feel as I do. For some amount of time these wilds should provide abundant [illegible] at what cost. [illegible] be the last to experience the [illegible] Colorado wilderness.

In particular, I have [illegible] a small portion of the Redcloud Peak [illegible] for serious consideration. [illegible] I feel as if this extended area [illegible] Redcloud Peak would [illegible] and [illegible] and sell it to be [illegible]

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

25

in the rockies. A great charm of this area is that it is absolutely untouched and offers great opportunity for exploration and discovery. Redesignated wilderness area can always be later redesignated open to mining. But a pit mined mountain can never regain its natural beauty.

These decisions should be based not on the pressures of momentary social needs, but on human needs and the need to educate and relate with nature without the constant pressures of society is one of the greatest of all. Please don't destroy this opportunity.

Thank you

A [illegible] citizen

26

MAPCO MINERALS CORPORATION
subsidiary of mapco inc.

RECEIVED
MAY 19 '82
B.L.M. Montrose Dist.

May 14, 1982

Mr. Henri Bisson
Bureau of Land Managsmsnt
P. O. Box 1269
Montrose, Colorado 81402

Re: Comments Regarding Draft Environmental Impact Statemsnt on the Gunnison Basin and the American Flats-Silvsrton Wilderness Proposals.

Dear Mr. Bisson:

Enclosed, for your furthsr handling, is a written summary of ths oral comments which I presented at the Public Hearing held May 13, 1982 in Dsnver, Colorado.

I appreciats ths opportunity to speak at the subject Hearing.

Sincsrsly,

Doug Hirschman,
Landman

DCH:dp

BUILDING #19 1667 COLE BOULEVARD GOLDEN, COLORADO 80401 (303) 233-1991

26

MAPCO MINERALS CORPORATION

MEMO

RE: COMMENTS MADE @ PUBLIC HEARING - HELD ON MAY 13, 1982 - DENVER, COLORADO.
DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE GUNNISON BASIN AND THE AMERICAN FLATS-SILVERTON WILDERNESS PROPOSALS.

During my review of the aubject Draft Environmental Impact Statement (DEIS) one rscurring theme presented itaelf. That is, the areas recommended as Wilderness (preferred alterations) were not the least mineralized areas, but rather, the most highly mineralized portions of the designated Wilderness Study Areas (WSA'S). To support such a statement, one merely has to compare the potentially mineralized areas recommended for wilderness with the potentially mineralizsd areas for the whole WSA. Overall, the mineralized land (state, private, claims) increased from approximately 41 percsnt to 55 percent. Those mineralized areas rated "high mineral potential" increased from approximately 46 percent to 50 percent. The areaa desaignated "Moderate Mineral Potential" increased from approximatsly 37 psrcent to 41 percent. Finally, thoss aress clasaified as "Low Minsral Potential" reduced from 17 percent to 9 percent.

It is a well known fact that ths Laks City-Silverton region in Southwestern Colorado is one of ths most highly mineralized and productive areas in the Unitsd States. Approximatsly 41 percsnt of ths WSA's in question have surfscs and minsrals which ars owned (privstsly), claimed, or lsased for minsral purposes. Providsd thsss arsas ars ultimatsly dsclarsd Wilderness, ths Adminiatrstivs Procsdurss for these sreas will not only bs complex, but costly. Ths BLM will havs to challenge a large portion of ths existing claims for validity with regard to whether or not s mineral discovery has besn mads. Furthermore, sxisting man-made improvsments must be removsd snd/or reclaimed in order to mest Wilderness Suitability Rsquirements.

26A

26B

The subject DEIB fairly addresses the potsntial for discovering such minerals as gold, silvsr, molybdsnum, cobalt, nickel, snd other various minsrals. Whst it fsils to point out is that some of thsss

Building #19 1667 Cole Boulevard Golden, Colorado 80401

26

Re: Comments by D. C. Hirschman @ BLM
Public Hearing - 5/13/82.

Page 2.

26B

minerals are "strategic minerals" in the sense that the United States imports the majority of said minerals from foreign countries. For instance, the United States is heavily dependent on foreign supplies of Cobalt and Nickel. These minerals play an important role in the manufacturing of jst engines for aircraft used in the defense of our country.

The DEIS goss to great lengths to describe the impacts caused or the losses to recreation and wilderness values if mineral development is allowed to occur as a result of a non-wilderness designation. It even places s value on recreation ao that one can calculate the financial losses associated with so-called adverse impacts on recreation. What the DEIS fails to address fully is the financial losses associated with mineral development ahould the subject areas be classified as wildernesa. Provided there is one commercially viable deposit which is precluded from development becauae it falls in one of the WSA's, the amount of income lost to the local communities, state and nation as a whole is significantly grester than the income received from recreation of all the WSA's combined. In addition, the DEIS fails to point out that the income resulting from recreation will probably be incurred outside the immsdiate vicinity of the area. In other words, the individual who would snjoy recrsation in a wilderness would probably incur the majority of his expenae prior to leaving his home for said area, or on the way to ths area.

26C

In Appsndix 1.1, the criteria for deciding whsther or not an arsa is "suiteble" or "non-suitable" for wildsrness desiignation are discussed. Critsris Number 8(A) deals with mandatory wildsrnsss charscteristics and statss: "The quality of ths area's msndatory wilderness charactsristics--sizs, naturslness, snd outstanding opportunities for solitude or primitivs recrestion". Also in the DEIS is Apprsndix 4.5 which addresses ths recreation opportunitiss. Appendix 4.5 shows all but ons WSA lacks primitive rscrestion opportunities. In addition, ths majority of the WSA's havs natural roads within their boundsriss. Thersfors, based on this criteria, none of the WSA's except for Redcloud Peak should have been initially considersd for wilderness designation.

26D

Comments by D. C. Hirschman @ BLM
Public Hearing 5/13/82

Page 3.

26

In closing, I would agree with the Statement's recommendation for non-wilderness classification on the Bill Hare Gulch and Larson Creek WSA's. In addition, I would recommend that the remaining WSA's be reclassified as non-wilderness as a result of their lack of primitive recreational opportunities and high mineral potential.

Mr. Doug Hirschman, Landman
MAPCO Minerals Corporation
1667 Cole Blvd. Suite 150
Golden, Colorado 80401

PH: (303) 233-1991

Response to Comment Letter 26

26A Existing manmade improvements, if protected under the "grand-fathered" provision of Section 603(c) of the Federal Land Policy and Management Act (FLPMA), or having "valid existing rights", do not need to be removed and/or reclaimed if the area is designated as wilderness. Validity exams will not be conducted on all mining claims; only on those claims where a plan of operation is received by BLM.

26B Several comments stated that the DEIS failed to point out that certain of the identified mineral commodities were strategic and critical minerals. Particularly, nickel and cobalt were cited.

Besides nickel and cobalt, the following items identified in the DEIS also appear on the list of strategic and critical minerals: aluminum, beryllium, copper, lead, zinc, molybdenum, silver, tungsten, vanadium.

The complete list of materials on the National Defense Stockpile Inventory of Strategic and Critical Materials may be found in the Stockpile Report to the Congress, October 1979 - March 1980, submitted by the Federal Emergency Management Agency, March 31, 1980.

This document was referenced in the DEIS but inadvertantly not cited in the document. It has now been included in this document under "Affected Environment - Common Resource Values - Geology and Mineral Deposits".

Since the writing of the DEIS, exploration within the Handies Peak WSA, consisting of one drill hole, has revealed indications of certain strategic and critical minerals in the vicinity of the ring fault system of the Lake City Calders. The drill core data substantiate the findings of the Barringer Report (OF-955), which was based on stream sediment geochemistry and surface sampling, as well as geophysical methods. In the core assay were anomalous concentrations of molybdenum and chromium, as well as traces of numerous other metals, many of which are strategic and critical.

This additional information is, of course, very preliminary, and is not intended to prove that there are commercial deposits of these elements, but merely that there are geologic conditions present which are favorable to the concentration of certain minerals.

26C An attempt has been made in the Final EIS to address the mineral development that might potentially occur in each of the WSAs. This has been done primarily in terms of location and size of operations and potential minerals that could be recovered. These possibilities have been detailed in Chapter 2. It is not possible, given the very speculative nature of these projections, to quantify any financial losses that might occur if some mineral development is foregone. The effect development of an alunite mine in Redcloud Peak would have on employment and per capita income has been added to Chapter 4.

26D As stated on pages 26 and 27 of the DEIS, the WSAs were classified in terms of a spectrum or continuum of available recreation opportunities (ROS). The definitions used in the naming of the ROS classes are not reflective of, nor are they synonomous with, the definitions of primitive or wilderness used in the Wilderness Act or FLMPA. The classifications merely depict relative types of experiences available to users, irrespective of any given WSAs suitability under Wilderness Act criteria. From an ROS perspective, what is important are the types of recreation experiences available in each ROS zone,not the name chosen to describe each. Various primitive types of recreation are known to exist in up to four of the six ROS classes.

27

Baumgartner

Mining Division
5670 South Syracuse Circle
Plaza West · Suite 418
Englewood, Colorado 80111
Phone (303) 779-5500

May 25, 1982

'82 MAY 27 AM 9 41

George Francis, Director
Bureau of Land Management
2000 Arapahoe Street
Denver CO 80202

Dear Sir:

At the recommendation of William Armstrong, I am taking this opportunity of express our dismay concerning the American Flats/ Silverton proposal.

I must agree that the region under consideration has great natural beauty and aesthetic appeal. It is also a combination of several early mining Districts. In the past several years, many major mining companies have made this area a focus for major exploration. Phelps-Dodge, Bear Creek, Noranda, Baumgartner, Homestake, Standard Metals, Houston, Amoco, to mention only a few that I'm familiar with, have all spent a great deal of time and effort in this region in exploration. We believe major metal deposits exist here, and it is obvious we are not alone in our thinking.

Our nation requires an abundant minerals supply to insure a secure future. Since the development of a deposit of the nature being sought requires a ten to twenty year lead time, wilderness proposals in historic mining districts seem to be detrimental to National Welfare.

I therefore wish to go on record as being opposed to the American Flats/ Silverton proposal and generally opposed to wilderness proposals in historic mining districts.

Sincerely,

Adrain W. Vander Pyl

AWV/mn

28

Colorado-Ute Electric Association, Inc.
P. O. Box 1149
Montrose, Colorado 81402

Telephone (303) 249-4501 TWX 910-929-6924

RECEIVED
JUN 14 82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson:

Gunnison Basin and the
American Flats-Silverton Wilderness
Draft Environmental Impact Statement

Colorado-Ute Electric Association, Inc. has reviewed the subject Draft Environmental Impact Statement (DEIS). It appears to us that the preferred alternatives, if ultimately selected, would leave land available for transmission line corridors between Lake City and Silverton, if such a transmission line were required in the future.

Colorado-Ute requests that the BLM continue to consider the needs of power suppliers during the wilderness review process and during the development of long range resource management plans.

Very truly yours,

Jerry A. Walker
Manager, Environmental Services

JAW/MAR:ds

29

ANASAZI [illegible]
P.O. Box 651, Lake City, Colorado, 81235

1 July, 1982

Henri Bisson, Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, Colorado 81402

Dear Sirs:

29A We have reviewed your DEIS for the proposed WSA in the Gunnison Basin and American Flats/Silverton Planning Units.

Having searched throughout your document, we cannot find any discussion of the long term implications of denying America access to the nations mineral resource base.

Was this oversight unintentional or does it reflect the policy of your Montrose District Office?

Sincerely,

Bradley L. Matoush
Vice President

Response to Comment Letter 29

29A We have attempted to identify the potential of the areas for mineral discovery, the likelihood of development and what will be foregone if designated. Given the lack of information on the mineral resources in these areas it is not possible to identify any long term implications if some are not available for development due to wilderness designation. It should be noted that valid existing rights would provide for continued access even with designation. As depicted in the final EIS valid rights are projected to exist and some mineral development is predicted even with wilderness designation.

30

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

July 6, 1982

RECEIVED
JUL 8 1982
B.L.M. Montrose Dist.

Mr. Henri Bisson
Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Re: Gunnison Basin and the American Flats/Silverton Wildarness Draft Environmental Impact Statement

Dear Mr. Biason:

Atlantic Richfield Company is submitting the following comments on the Gunnison Basin/American Flats/Silverton Wildarness Draft Environmental Impact Statement.

The Lake City - Silverton region in southwestern Colorado is one of the most highly mineralized and productive mining areas in the United States. Because of the severe conflict with pre-established mining activities and mineral values we do not believe that Red Cloud Peak and Handies Peak should be considered for wilderness recommendation.

Red Cloud Peak - CO -030-203

Red Cloud Peak WSA is located in the 22.5 million year-old Lake City Caldera. Polymetallic vein ores from this area have produced gold, silver, lead, zinc, and minor copper and uranium since 1874. This area is rated extremely high for mineral potential. The preferred alternative area contains approximately 400 mining claims. We support the No-wildarness Alternative for the Red Cloud Peak WSA because the mineral values of this area more than outweigh any wildarness values which may exist.

Handies Peak - CO-030-24i

Handies Peak WSA consists of Tertiary volcanic rocks of the Silverton Volcanic Series. Precambrian granite is exposed along the east and southeast sides of the WSA.

Volcanic rocks in this area that host vein ores (copper, lead, gold, zinc, and silver) are mainly

30

rhyolite and quartz lstite flows and tuffs. The most common host is the Sapinero Mesa Tuff, which volumetrically is the chief rock unit filling Handies Peak. Reported occurrences of base metal potential from the precambrian granite denotes further evidence of this WSA's mineral potential. Approximately 125 mining claims are included in the preferred alternative.

In light of this mineral potential, we support the No-wilderness Alternative and urge that BLM recommend that Handies Peak be returned to multiple-land use management.

Colorado is an important State for the production of silver, gold, lead, zinc, copper, and molybdenum. The diversity in metal content in those commodities has had the advantage of bringing about a somewhat steady, yearly production in terms of overall total dollar values throughout most of the period of active mineral development, followed by appropriate land reclamation, can coexist with recreational uses and aesthetic enjoyment of public lands. This harmonious relationship is implicit in the concept of multiple-use. Artificial regulations and restrictions should be eliminated, which discourage the prospector, mining companies, and the mineral industry in general, in their search for and in the development of mineral deposits in areas where there is high mineral potential. If such encumbrances are removed, Colorado can continue to carry its proportionate share with other mining states to produce metals for the national security and economic needs of the nation.

We appreciate the opportunity to comment on the Draft Environmental Impact Statement and urge you to remove Red Cloud Peak and Handies Peak from futher wilderness consideration.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM:drm

31

AMAX INC.

CLIMAX MOLYBDENUM COMPANY
AMAX MOLYBDENUM DIVISION

DAVID W. DELCOUR
VICE PRESIDENT
AND DIRECTOR OF
EXTERNAL AFFAIRS

June 7, 1982

Mr. Henri Bisson, Project Manager
Bureau of Land Management
P.O. Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson,

AMAX Molybdenum Division welcomes the opportunity to submit the following comments on the Draft Environmental Impact Statement for the Gunnison Basin and American Flat-Silverton Wilderness Study Area. The AMAX Molybdenum Division operates major molybdenum mines in Colorado and conducts mineral exploration activities on U.S. Forest Service lands in various parts of the western United States. AMAX Exploration, Inc., the Corporation's major exploration company, conducts exploration worldwide.

AMAX not only shares the President's "deep concern" regarding the incressing dependence of the U.S. and the free world upon foreign sources for strategic and critical materials, but also concurs with his recent National Minerals Policy to decrease America's minerals vunerability by taking positive action that will, in essence, promote a more balanced use of our natural resources. In his report to Congress, pursuant to the National Materials and Minerals Policy Act of 1980, he states clearly that in order to diminish our minerals vulnerability, his policy recognizes the "need to keep public lands open to appropriate mineral exploration and development".

Unfortunately, the recommendations in the DEIS do not reflect any recognition of this policy nor even begin to strike a balance between our stated critical need for minerals and the desire for wilderness preservation. Specifically, AMAX has two somewhat separate

1707 COLE BOULEVARD, GOLDEN, COLORADO 80401 (303) 231-0209

31

but related concerns with the wilderness recommendations in the DEIS for the Red Cloud Peaks, Handies Peak, American Flats and Weminuche Contiguous Wilderness Study Areas.

1. Mineral Potential - We would first like to commend the BLM for a thorough mineral analysis of the study areas. We are, however, concerned that over 20,000 acres of very high mineral potential are being recommended for withdrawal from mineral entry at a time when America's vulnerability to foreign mineral sources continues to increase. This particular 20,000 acres is especially critical since it lies in the southern portion of the renowned Colorado Mineral Belt, visibly supports extensive mineral activity and is a current exploration target for many mining interests. Economic concentrations of minerals are rare. To selectively withdraw known commercially productive mineral areas from continued exploration seems contrary to the President's policy which recognizes the need to allow private enterprise to preserve and expand our minerals and materials economy.

2. Decision Making Process - We are very concerned about the apparent disregard of the mineral data collected in this area, by BLM. We question the procedural and decision making process that calls for the data, receives it, and does not use it. It is even more perplexing and disturbing to the industry, which is looking down the road at hundreds of BLM wilderness study areas yet to be reviewed, to think that such minerals data is not weighed more heavily in the wilderness study area decision making process.

MINERAL POTENTIAL

Red Cloud Peaks. AMAX has been active in the Red Cloud Peak area, and concurs with the BLM's mineral assessment that the area is highly mineralized. The fault and fracture patterns indicate that economic mineral deposits could exist and initial exploration efforts by our company, as well as others, indicate anomalous concentrations of gold, silver, copper, lead, zinc, titanium, and molybdenum, as well as other elements.

31

31A

It is not a coincidence that active mining has occured in the area since the turn of the century. The area hosts 25 parcels of patented mining claims. Over 900 unpatented mining claims account for over 50% of the WSA and the area still is being explored actively by a variety of mining companies. Furthermore, the BLM notes that a known alunite deposit could prove to be a significant mine development. While the monitery loss of this known reserve is calculated in the DEIS, there is no attempt to place any value on the loss of the other potential mineral developments in the area. We agree that such numbers are extremely difficult to compile, but to state that only property tax revenues from inactive mine properties will be lost, falls deceptively short of the millions of dollars that would be generated to the local and national economy if even one or two mines, depending on size, were located in the area. This same cost analysis deficiency exists for every mineralized area in the DEIS.

Furthermore, the roads and mining activity and the isolation of the tract, with respect to managability, do not meet the wilderness quality criteria. For all the above reasons, we strongly disagree with the recommendation that the Red Clouds Peaks area be included in the National Wilderness Preservation System.

Handies Peak. Another highly mineralized area of keen interest to AMAX is Handies Peak. Adjacent to the productive Eureka Mining District, which has produced over 79 million dollars in lead, zinc, gold, silver and copper in the past, Handies Peak is potentially as valuable for base metals production. Striking molybdenum anomalies exist in the area, as well as uranium, nickel and cobalt mineralization. The withdrawal proposal is contrary to the Administration's present effort to decrease our vulnerability in strategic and critical materials, such as nickel and cobalt, and Congressional efforts presently under way to lend federal support to help develop such resources. Over 200 mining

31

Page 4

claims are present, with active exploration ongoing. We therefore recommend against wilderness designation for the Handies Peak WSA.

American Flats. While exploration continues in this WSA, most of the new evidence of mineralization is from geochemical data noting the presence of uranium, precious and base metals and such metals as molybdenum. 40 mining claims exist in this area at the present time. Inasmuch as the area has potential and is in the early stages of exploration, we can find no justification for withdrawing this area from further mineral exploration.

Weminuche Contiguous and Larson Creek Areas. AMAX exploration activites have been significant in some portions of the Weminuche Wilderness, an area valued as having high commercial mineral potential. The Weminuche Study Area is not only adjacent to the extremely productive Silverton District, having produced over 61 million dollars during the past 100 years, but the same mineral trends from the Silverton District flow directly into the WSA. A majority of this area soon will be withdrawn from mineral entry as a result of the Forest Service's RARE II process and earlier wilderness designations.

31B

The Larson Creek Area is high in mineralization such as molybdenum, tin, uranium, and precious and base metals. AMAX opposes inclusion of both of these areas into the Wilderness System especially in light of the significant amount of Wilderness acres already designated nearby.

UTILIZATION OF MINERALS INFORMATION IN DECISION MAKING PROCESS

As noted, we commend the BLM on its mineral analysis. Because of the hidden nature of most mineralization and the lack of time and funding by government agencies for data collection, most wilderness study mineral assessments have been lacking and wilderness

31

Page 5

decision makers have not benefited from adequate information. In this case, however, the collection of mineral data on the area is thorough and comprehensive, as well as being highly suggestive of striking mineral development potential. We are thus amazed at the contrast between BLM's mineral report and the resulting withdrawal recommendations. Procedurally, this is of serious concern to those of us in the industry who have lost many potentially interesting mineral areas to wilderness because we were told not enough data was available.

31C

The BLM Wildneress Study regulations require that all energy and mineral resource values be taken into consideration, and states that all BLM studies reflect the national need for developing those minerals that are critical to the economy and security of the U.S. While the BLM identifies cobalt and nickel potential, for example, they are not highlighted as strategic and critical minerals as required by the regulations. Nor is there any apparent attempt to follow the Presidential mandate to the Department of the Interior to decrease our vulnerability posture through various land management policies.

The "Geochemical and Geostatistical Valuation, American Flats-Silverton Planning Units" open file report was used in mapping those zones of the proposed wilderness areas with regard to whether development for mineral potential was high, moderate or low. The draft wilderness recommendations fail to take into account this information which the National Material and Minerals Policy Research and Development Act of 1980 requires be considered in such land use planning processes.

31

Page 6

In summary, AMAX does not believe the WSA's in the American Flat-Silverton Draft Environmental Impact Statement warrant wilderness status because of the high mineralization, the past and present mining activity in the area, including roads, patented and unpatented claims and the abundance of almost one million acres of wilderness that already exists in the immediate vicinity. We also are concerned with the procedure that allows such withdrawals to be made, in spite of well documented mineralization when, both the Administration's policy and the law requires a more balanced approach.

We appreciate the opportunity to comment on American Flats-Silverton Proposed Wilderness Study Areas, Draft Envrionmental Impact Statement.

Sincerely,

David W. Delcour
Vice President
and Director
Governmental Affairs
Climax Molybdenum Co.

DWD/jb

Response to Comment Letter 31

31A See our previous Response 18B.

31B The information available at the time of writing the DEIS did not indicate any such mineralization in the Larson Creek area. However, since that time, an informal report by the Los Alamos Scientific Laboratory entitled "Multisource Data Set integration and Characterization of Uranium Mineralization for the Montrose Quadrangle, Colorado", indicated anomalous sulfide mineral concentrations in this area. This report is the only published information available relating to mineralization in the Larson Creek area.

31C See our previous Response 18C.

32

ROBERT W. VIRTUE, M.D.
737 BIRCH STREET
DENVER, COLORADO 80220
TELEPHONE (303) 399-9388

2 May 82.

Bureau of Land Management.
Montrose District
Box 1269,
Montrose, Colo 81401.

BLM

Gentlemen:

I shall be unable to attend the hearing in Denver on May 19th regarding Wilderness areas, so I am writing to present my thoughts.

The San Juan Wilderness areas are the prettiest part of the State, and should be left that way. Please do not release any of the present land.

Letting ANY of Wilderness areas be released can set a terrible precedent for nibbling wherever a developer wants to work. Decrease in U.S. Wilderness areas is a very bad move on wild life, as is being seen in Africa.

Reducing the Wilderness areas means selling the National Welfare to individual greed.

Sincerely yours,

Robert W. Virtue

33

Montrose District BLM
Box 1269
Montrose, Colo 81401

Dear Sirs?

I have climbed in many of the mountains, Sangres, & Huerfanos, also a good many in the magnificent area of the San Juans, and I want all to see a good part of them as soon as we get wilderness protection. Once its dug up, drilled and destroyed, no more can ever put it back together, again as it once was. Only God could create such a beautiful area, so why should man mess it up. There's only a few strongholds of wilderness left, do we greed to put our scars on everything we touch? Ranchette Creek was a beautiful place before Exxon dug it up & then decided it didn't want to continue anymore, & the people are out of jobs anyway.

Sincerely, Thomas Hancock

34

ST. LOUIS ZOOLOGICAL GARDEN
By crossing their long necks, this pair of reticulated giraffe, from East Africa, solves the problem of how to be both companionable and comfortable. Acute eyesight, coupled with great height, give the giraffe the best vision of any African game animal.

Post Card

Wilderness
1 MAY 82

7 May 1982

Dear BLM,
Such a very small [illegible]
I can't do without
I'd recommend the
following:
1. All of the Handies area
2. Redcloud/Sunshine area
3. San Juan Wilderness
4. American Flats

Please consider my request.

Bill + Kathy Hendricks
Rt 2
Hotchkiss, Colo. 81419

Montrose Dist BLM
Box 1269
Montrose, Colo.
81401

35

May 6, 1982

Montrose District BLM
BOX 1269
Montrose, CO. 81401

Wilderness Desk

Dear People,

Please save our spectacular wild areas in the San Juan Mountains of Colorado! The alpine peaks and meadows in this area are some of the most beautiful in the state, and also my favorite sight-seeing spot. I am asking you to recommend wilderness protection for:

- All of the Handies area
- 32,000 acres of the Redcloud Peak WSA
- American Flats, which could be added to the Uncompahgre/Big Blue Wilderness
- Animas Canyon (West Needles, Whitehead Gulch, and Needle Creek)

These areas should be kept pristine and protected so that our grandchildren and great grandchildren may also enjoy them.

Sincerely,
Marilyn Hartnett
Denver, Co.

36

[illegible] Yampa [illegible] Street
[illegible], Colorado 81401
May 6, 1982

Montrose District BLM
Box 1269
Montrose, Colorado 81401

[illegible]

I am writing to urge you support and recommendation for the following areas for wilderness designation. All of the Handies Peak area and the Wilson Management Alternative portion of the Red Cloud area. I [illegible] this lovely area [illegible]

36

summers ago and would hope that not only the peaks but the meadows and valleys around them could be preserved.

Sincerely,
Judith Cox

37

1250 South Monaco - #38
Denver, Colorado 80224

May 7, 1982

B.L.M. Montrose Dist.

Montrose District BLM
Box 1269
Montrose, Colorado 81401

Dear Sir:

I am writing to express concern over the Environmental Impact Statement recently released on the San Juan mountains Wildarness Study Area.

These are some of the most beautiful mountains in Colorado. It is hard to believe that protecting only 18,000 acres of them is a fair distribution for future generations. And what happens to those 18,000 acres when the remaining 40,000 acres are open to the pollution and destruction that accompanies development? Please reconsidar your recommendation and submit for Wilderness Protection:

37,500 acres of the Redcloud Peak Wilderness Study Area, including Alpine and Owl Gulches with Redcloud and Sunshine Peaks.

All of the 18,860 acres of Handies Peak.

American Flats

Animas Canyon

I am writing as a concerned citizen who appreciates the mountains for recreation and renewal. I am interested, as I am sure you are, in preserving wilderness for this and future generations.

Thank you.

Sincerely,

Sharon Konen Bosiar

cc: Senator Gary Hart
Senator Bill Armstrong
Representative Pat Schroeder

38

May 5, 1982

Suzanne H. Kaempfer
997 B, Roxwood Lane
Boulder, CO 80303

Montrose District BLM
Box 1269
Montrose, CO 81401

B.L.M. Montrose Dist.

Dear Agent:

I would like to express my strong objections to the recent draft EIS in which the BLM has recommended for Wilderness only 11,190 acres of the 40,575 acre Redcloud Peak area and only 7,215 of the 18,860 acre Handies Peak area. This decision, I feel, reflects a total disregard for the outstanding scenic characteristics and opportunities for solitude afforded by these areas. This recommendation must be amended to include wilderness protection for:

1) 37,500 acres of the Redcloud Peak WSA, including Alpine and Owl Gulches with Redcloud and Sunshine Peaks;
2) all of the Handies area;
3) all of the following WSA's: American Flats, Animas Canyon, Friends/Snowling Gulch, Slumgullion Slide, Larson Lake, Hill Mare Gulch, and Weminuche Contiguous.

Thank you for allowing me to submit my comments.

Sincerely,

Suzanne H. Kaempfer

Suzanne H. Kaempfer

39

935 Northern Way #24
Grand Junction, CO 81501
May 8, 1982

RECEIVED
MAY 11 '82
B.L.M. Montrose Dist.

Montrose District Office
Bureau of Land Management
P.O.B. 1269
Montrose, CO 81401

Dear Sirs:

We recently read in the Grand Junction Daily Sentinel of the BLM decision to delete substantial portions of the San Juan mountain area WSAs from the recommendations. We are quite unhappy about the deletions. We feel that the Handies Peak area should have been included in the recommendation in its totality, as should the Redcloud Peak area. These two fourteeners should be protected along with the surrounding areas. In addition, the American Flats WSA should not be left out, since it is such a unique area, and fits in so well with some of the National Forest areas.

We feel these areas would be excellent additions to Colorado Wilderness, and should not be cut back. The areas are clearly outstanding, and should be preserved in their totality for future generations of Americans to enjoy. We urge you to expand your recommendation to include the full WSA areas.

Sincerely,
Stephen L. Gilsdorf
Susan D. Gilsdorf
Stephen L. Gilsdorf
Susan D. Gilsdorf

40

Gentlepersons: Date 5/7/82

[redacted]

I had the pleasure of a visit to the Redcloud Peak Wilderness area last fall, so I was much concerned today that I read in the newspapers that some beautiful and still pristine area might be excluded from wilderness protection.

Please consider the importance of protection for this as well as for the Handies - I hope to see that remarkable

[redacted]

area this summer. I think when our generation is looked back on in history, nothing will seem more important than protecting these areas for the future. I am a 79-year-old homemaker. Nina Johnson, 747 12th St, Boulder 80302

41

5-9-82

Mr Henri Bisson
Bureau of Land Management
Pe Box 1269
Montrose Colorado

RECEIVED
MAY 12 '82
B.L.M. Montrose Dist.

Dear Henri Bisson

I have received and reviewed the Environmental impact Statement for the American Flats Silverton wilderness areas. I have been on two outings with the Colorado Mountain club in this area. I noticed a great deal of difference the second time I was there. They had let mining interests in the area and one of the streams was completely dead. Of concern me because that is the Source of our water. I would like to see the area preserved in as much a natural state as possible.

I support the mountain Club in its decision as to the areas to be preserved.

Sincerely
Robin Liggett
1110 E Taylor Ave
Englewood Colo 80110

42

May 10, 1982

RECEIVED
MAY 12 '82
B.L.M. Montrose Dist.

Mary S. Caton + Jerry Rosser
9105 E. Lehigh Ave #81
Denver, CO
80237

Dear Sirs:

Have you ever climbed to the top or near the top of a 14,000 foot mountain? Or any mountain for that matter? Or even a hill? If you have, you will realize that the thousands of acres spreading out below and about that high point are just as beautiful and as awe-some as that peak. What a sight to behold— total wilderness! What a thought it to think that maybe, someday, that wilderness may be open to strip mining, oil exploration, lumbering - INDUSTRY. Where will the animals go, what will happen to the plant life? Where will man go for solitude? Where will he view virgin forests and spectacular scenery?

Let it be known that we believe all 40,575 acres of the Redcloud Peak area and all 18,860 acres of the Handies Peak area in the beautiful San Juan Mountains of our great state Colorado, should be

42

recommended for total Wilderness. It is extremely important that this area remains closed to so-called "industrial progress" and land overuse and abuse.

Signed sincerely,
Mary S. Colton
Jerry Rosser

43

I strongly support the Colorado Environmental Coalition Council in its plea for wilderness protection for:

- All of the Handies Peak area.
- 37,500 acres of the Redcloud Peak area to include Alpine and Owl Gulches.
- American Flats.
- Animas Canyon.

William M. Folger
Professor William M. Folger
2350 Locust Street
Denver, Colorado 80207

44

Anne Vickery
5255 Pennsylvania Ave.
Boulder, Colorado 80303

RECEIVED
MAY 17'82
B.L.M. Montrose Dist.

Mr. Henri Bisson
BLM
P.O.B. 1269
Montrose Colorado, 81401

May 14, 1982

Dear Mr. Bisson,

This letter concerns the Gunnison Basin - American Flats - Silverton Wilderness DEIS. I am writing to strongly urge that you expand the proposed designation as Wilderness of part of the Handies Peak WSA to the full acreage which is under consideration, 15,860 acres. I also strongly urge that the proposed Wilderness designation of part of the Redcloud Peak WSA be expanded to at least 37,500 acres which would include Redcloud and Sunshine Peaks and Owl Gulch and Alpine Gulch.

I have had the pleasure of climbing Handies Peak several summers ago and have climbed Redcloud and Sunshine twice and have spent considerable time in the area. The area is unique among BLM Wilderness Study Areas in Colorado. The high peaks offer a challenge to the hiker. But the climb is one that families and non-technical climbers can enjoy. The views of Colorado from the tops of the peaks, particularly towards the Weminuche and Big Blue Wilderness Areas, are magnificent. There are elk and sheep herds in both the Study Areas, but this territory is apparently not included, to any degree, in the proposed Wilderness designations.

The proposed designations do not do justice to the Wilderness potential of these two areas. Within the Wilderness Study Areas there is opportunity for camping, fishing, viewing of wildlife, hiking, exploring and many "Wilderness experiences". This is based on the unique characteristics and diversity of the two areas. The proposed Wilderness designation for both areas limits the Wilderness boundaries to only the high peaks which eliminates the backcountry experience which one hopes for in a Wilderness area.

There is a strong economic argument to be made in favor of Wilderness designation beyond that currently proposed. Wilderness areas have proven to be a tourist attraction and an economic benefit to surrounding communities. The recreation economy does not suffer the boom and bust cycle of the mineral economy, which Colorado has seen so much of in the past few months. Wilderness areas will always attract tourists from in state and from out of state. Designation of all of the Handies WSA and at least 37,500 acres of the Redcloud WSA as Wilderness would provide an area where a family could spend its whole vacation instead of just climbing the high peaks to get into the Wilderness and then moving on.

Furthermore, it is doubtful that any of the mineral deposits mentioned in the various WSA reports could be mined as cheaply as the mineral or end product could be recycled from existing supplies. This is particularly true of the alunite depost east of Redcloud and Sunshine. This is ~~particularly~~ true when considering the policies of Public Service Co. and Colorado-Ute that new developments must pay not only the fair cost of supplying electricity but the cost of capitol construction necessary to create electricity.

I therefore urge you, based on the above arguments, to reconsider the proposed Wilderness designations and to expand the proposals for both Handies and Redcloud.

Sincerely, Anne Vickery

45

RECEIVED
MAY 17'82
B.L.M. Montrose Dist.

1401 Mariposa Ave.
Boulder, CO 80302
May 13, 1982

Henri Bisson
Bureau of Land Management
Box 1269
Montrose, CO 81402

Dear Mr. Bisson:

We are writing to support wilderness designation for the Red Cloud Peak Wilderness STudy Area. However, we think the present proposal is inadequate and hope you will expand the wilderness to include the surrounding area and not just the peaks themselves.

We have taken many backpacking trips into the San Juan mountains and think this is the most spectacular scenery in the state. Thirteen years ago we climbed Red Cloud and Sunshine, and that experience is one of our most treasured memories. Unique and beautiful places such as this deserve the protection afforded by official wilderness designation and should be preserved for future generations.

Although we have not yet climbed Handies, it is on our list for this summer, and we also support wilderness designation for this area.

Sincerely,
Dr. & Mrs. Glenn Cushman

Dr. and Mrs. Glenn Cushman

46

RECEIVED
MAY 18'82
B.L.M. Montrose Dist.

Box 1
Cascade, C 80809
May 17, 1982

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81401

Dear Mr. Bisson:

I should very much like to see an improvement in your recommendations for wilderness in the Gunnison Basin-American Flats Resource Area.

Specifically, I would suggest that you support BLM's wilderness recommendations for small additions to the Weminuche and Big Blue/Uncompahgre Wilderness Areas, that you include all of the Alpine Gulch drainage in the Redcloud Peak proposal for wilderness.

I should also like to see full boundaries for the Handies Peak area. I should like BLM to pursue cooperative management with the Forest Service on the southern part of the area.

This area is a magnificent one and should be fully protected.

Sincerely,
Elizabeth C. Bosley
(Mrs. Elizabeth C. Bosley

47

9995 E Harvard Ave # C-104
Denver, Colorado 80231
May 16, 1982

Montrose District BLM
Box 1269
Montrose, CO 81401

RECEIVED
MAY 19'82
B.L.M. Montrose Dist.

Dear Montrose District BLM

I am writing this letter to strongly urge you to reconsider your recent recommendation for Wilderness of 11,190 acres of the 40,575 acre Redcloud Peak area and 7,215 of the 18,860 acre Handies Peak area. I want Wilderness protection for all of the Handies Peak area, 37,500 acres of the Redcloud Peak WSA, including Alpine and Owl Gulches with Redcloud and Sunshine Peaks, and for the areas of American Flats, Animas Canyon, Friends/Sparling Gulch, Slumgullion Slide, Larson Lake, Bill Hare Gulch and Weminuche Contiguous.

I am appalled at the beautiful lands that you are not recommending Wilderness protection for. Please reconsider. We and future generations need these lands as Wilderness.

Sincerely yours,
Jane E. Schlemmer

cc: Representative Pat Schroeder, Senator Gary Hart, Senator Bill Armstrong

48

RECEIVED
MAY 24'82
B.L.M. Montrose Dist.

May 18, 1982

To Whom It May Concern:

I attended the public hearing with the Bureau of Land Management in Denver on Thursday, May 13. However, I did not testify at that time. I wish to do so in this letter, and I am representing myself.

As a member of the Colorado Mountain Club, a lover of the outdoors, and a climber of Colorado's 14,000 ft. peaks, I feel it is important for me to voice my opinion on the designation of the Wilderness Study Areas that the Bureau of Land Management has currently proposed.

Although I personally have not climbed Handies, Redcloud and Sunshine Peaks in the heart of the San Juan Mountains, I plan to at some future time and am very impressed with the overall beauty of this particular area.

I feel it would be a grave error for the BLM to recommend only small portions of the Wilderness Study Areas for protection. Protection for only the tops of these 14ers is not enough! Not providing protection for the land surrounding these beautiful peaks in the San Juans will spell disaster to those who enjoy the area now and for future generations. It is important that the BLM not limit this acreage.

Once wilderness is taken away it can never be restored to the same condition. The beauty of this splendid area will forever be lost. Mining claims will only scar this lovely area.

Please designate more wilderness acreage for the Handies, Redcloud and Sunshine Peak areas. More specifically, all of the Handies area, 37,500 acres of the Redcloud Peak Wilderness Study Area, including Alpine and Owl Gulches.

Thank you.

Sincerely,
Jean Glebe

Jean Glebe
817 Buckeye
Fort Collins, CO 80524

cc: Senator Gary Hart
Senator William Armstrong

49

May 20, 1982

RECEIVED
MAY 24'82
B.L.M. Montrose Dist.

Montrose District BLM
Box 1269
Montrose, Co 81401

To Whom It May Concern:

This is in regard to the Wilderness Study Area in the San Juans.

These beautiful areas of the San Juans that are up for review are areas that I have camped, hiked and backpacked in.

I feel Wilderness protection should be given to the 37,500 acres of the Redcloud WSA including Alpine and Owl gulches, all of the Handies area, and the other WSA area of American Flats, the 3 sections of the Animas Canyon-West Needles, Whitehead Gulch and Needle Creek, and the additions of Friends-Sparling Gulch, Slumgullion Slide, Larson Lake, Bill Hare Gulch and the Weminuche Contiguous.

The wilderness of these areas just can't be destroyed which will happen if there is no protection. The mountains are receiving more pressure than ever from campers and hikers and this will certainly continue.

Thanks for your consideration.

Sincerely,

Bea Collins

Bea Collins
3710 Teller St.
Wheat Ridge, Co 80033

50

RECEIVED

Montrose District BLM
Box 1269
Montrose, Colo. 81401

550 South 41st Street
Boulder, Colo. 80303

B.L.M. Montrose Dist

Dear Sirs:

I want to urge adoption of most of the All-Wilderness alternative for the American Flats-Silverton Wilderness area. Most important are the Red Cloud Peak, Handies Peak, and American Basin areas. For Red Cloud it does not seem right or sensible to preserve the tops of the mountains while leaving the lower slopes and valleys to development. The three areas make a coherent whole that would be destroyed by the present proposals. The reduction by almost 75% in Red Cloud would leave out large areas that would serve those not up to climbing to 14000'. Also, a large proportion of the potential user public would be barred from areas they could use., while others would have to go through large tracts of developed land to get to what little wilderness there was. By preserving only the tops, it is questionable for whom this is being done. It would not leave much for future generations.

I have camped and hiked up and around Red Cloud and Handies and have found the area to be outstanding for all grades of hikers and to have much to satisfy a broad range of interests. It is also, of course, a very scenic and spectacular area which should be preserved for this alone if for nothing else. The peak can be climbed without technical expertise and the lower areas offer a wide range of ecological habitats and conditions. The fact that the Handies and Red Cloud areas are separated by a road does make them quite accessible, but this will only make an extra effort at management necessary. It certainly should not prevent wilderness designation right down to the roadside.

50A

American Flats area is just as crucial. This valley is spectacular and its stands of wildflowers are some of the finest I have seen anywhere. Vehicular traffic is already beating it down and they should be excluded. The 6700 acres proposed for this area would be a natural addition to the Uncompahgre-Big Blue Wilderness already in existence.

I therefore urge that designation of the Wilderness Manageability Alternative of 37,500 acres for the Red Cloud Wilderness Study area and not the Conflict Resolution alternative II (11,400 acres). The latter proposal does not truly represent a desire for real wilderness preservation. Further, the Handies Peak area should include the full All-Wilderness alternative of 18,300 acres. Anything less would ruin a superb region for recreation. More important, though, it is a region with many attributes which need preserving, including scenary and wildlife. The Conflict Resolution Alternative is unacceptable and would ruin a beautiful area. I do not feel that mining interests should have free rights to this area when so many others would be better served without permanent damage to the environment. Therefore, I urge changes in the preferred alternatives to all or nearly all the land included in the Study Areas.

Thank you.

cc. Timothy Wirth
Gary Hart
William Armstrong

Sincerely,

Paul M. Winston

Reaponae to Comment Letter 50

50A According to the Gunnison Basin and American Flats/Silverton ORV Plan, 1981, all ways and trails in the area are closed to motorized vehicles.

51

RECEIVED
MAY 20 '82
B.L.M. Montrose Dist

May 14, 1982
4812 Quitman St.
Denver, Co 80212

Montrose District
I am in favor of large Wilderness Areas on the BLM land in Colorado. Particularly supported I am in the entire Handies area and 37500 acres around Redcloud Peak. Please protect all of the Wilderness Study Areas with Wilderness status so we may continue to enjoy them as they are. Still by visiting them + just knowing they exist.

Sincerely Donald E. Parker

52

Salina, Kansas
May 17, 1982

RECEIVED
MAY 20 '82
B.L.M. Montrose Dist

Montrose District BLM
Box 1269
Montrose, Colorado 81401

Dear Sirs:

Your recent recommendation on the San Juan Mountain wildlands has caused me some concern. I understand that, of the whole area, only a small part has been recommended as a wilderness area. Because of the spectacular scenery, varied topography and unique vegetation and wildlife, I hope you will reconsider the excluded areas for inclusion in the wilderness designation.

I especially hope you will reinstate the entire 37,500 acres of the Redcloud Peak area, including Alpine and Owl Gulches. I would also hope for the inclusion of all of the Handies area, as well as the remaining wilderness study areas in the San Juans. Without the inclusion of these areas, Redcloud Peak and Handies Peak would become the smallest wilderness areas in Colorado, in spite of the fact that they are in a group of very tall peaks.

Thank you for your consideration of my views.

Chris Sette

(Ms.) Chris Sette
124 South Hilldale
Salina, Kansas 67401

cc: Sen. Gary Hart
Sen. Bill Armstron

53

RECEIVED
MAY 28 '82
B.L.M. Montrose Dist.

Box 215
Norland, Co. 80449
May 22, 1982.

Dear Sir

I wanted to write to you and tell you how much I agree with Charles Austin of Denver on the opinions given at the Wilderness Hearing in Lake City last week.

Austin had the nerve to finally come out and say what I've felt for a long time - that a lot of this so-called push for Wilderness is in reality an attempt to "lock up" our natural resources. A lot of people don't seem to realize this aspect of it.

The other point that I also agree with Austin is that once you designate an area "Wilderness" it is on the map and fair game to every brochure that advertises wilderness areas, and will surely draw more people than if left alone as now.

For years, BLM and the Forest

53

Service managed it's areas with some restrictiveness - enough, I'd say, to keep it "nice" for backpackers; but also usable.

This recent push for Wilderness Areas is seen by a perceptive few, as a dangerous left wing trend to depress careful mining of our strategic mineral deposits.

My husband and I work in Lake City in the summers; so our interest is that of a "local" resident, and the long-range impact.

Sincerely,
Ruth V. DeHaan
(Mrs. Jake DeHaan)

54

RECEIVED
MAY 26 '82
B.L.M. Montrose Dist.

736 Maxwell Avenue
Boulder, Colorado 80302

May 24, 1982

Montrose District
Bureau of Land Management
Box 1269
Montrose, Colorado 01401

Dear Montrose BLM:

We are writing regarding the Redcloud Peak and Handies Peak Wilderness Study Areas.

We understand that the BLM in their Draft Environmental Impact Statement has recommended that only 11,190 of the 40,575 acre Redcloud Peak WSA be designated as Wilderness. We strongly believe that much more of this spectacularly beautiful area warrants designation as Wilderness, particularly Alpine and Owl Gulches. We believe Wilderness designation for 37,000 acres of this area would be much more appropriate than the acreage currently recommended by BLM.

Regarding Handies Peak, we believe all of the current WSA (18,860 acres) should be recommended for Wilderness designation. The Sloan Lake Basin below Handies is absolutely beautiful, and we would like to see the entirety of the Handies Peak WSA preserved for future Coloradoans.

Sincerely,
Beverly & Tony Baker
Beverly and Tony Baker

cc: Senator Gary Hart
Senator Bill Armstrong
Representative Tim Wirth

55

CAPITOL HEIGHTS PRESBYTERIAN CHURCH

1100 FILLMORE STREET

DENVER COLORADO 80206

MARK MEEKS

303/333-9366 303/333-4306

RECEIVED
MAY 28 '82
B.L.M. Montrose Dist.

Montrose District BLM
Box 1269
Montrose, Co. 81401

May 25, 1982

Dear BLM,

I am writing in regard to your Draft Environmental Impact Statement on Colorado BLM Wilderness Study Areas.

First, I would like to stress the increasing need in our country for wilderness recreation. I do not believe Colorado has areas of wilderness sufficient to meet the interests of our citizens in wilderness experiences. Many present wilderness areas are heavily used and the demand for wilderness opportunities has experienced spectacular growth in recent years, growth that I am confident will continue. Thus, I believe the BLM should recommend more Wilderness Study Areas for wilderness protection. The acreage is too little for the demand that lies ahead.

Secondly, and more importantly, it is my personal conviction that wilderness designation is our best multiple-use alternative, given its significant emphasis upon preservation along with other concerns; i.e., wildlife habitats, watershed, grazing and recreation. When we in this country set aside land for preservation, we have done one of the most important things we can for the future of this country, and for respect of human values. In wilderness preservation we take action to recognize the goodness of life apart from only human life; we relate to that around us as worthy of respect and of restraint on our part. We undergird then a sense of careful, deliberate choice in relating to our environment, recognizing our land has value beyond use and that we should where we can act accordingly.

Preservation is best done and can best be managed when entire ecologies are preserved. I would urge therefore, that in the Redcloud and Handies Peak Areas that the 40,575 acres of the first and 18,860 of the latter all be designated wilderness, so that there would be completeness to the area preserved. I would oppose the BLM recommendations from the perspective that they truncate would could be and should be a more complete wilderness.

Accordingly, I would support wilderness designation for the American Flats and Weminunche Contiguous area as to their addition to existing wilderness will significantly enhance wilderness protection in our state.

There are conflicts with wilderness , of course. But when one looks at the entirety of BLM area, it is clear that wilderness designation will be applied to only a small part and that by far the greater part of BLM lands is open for such developments as mining, oil, and gas wells. We actually would be making a small percentage commitment to make all wilderness Study Areas become wilderness.

Finally, I am convinced strong tourism in Colorado is highly dependent upon those scenic values respected most through wilderness designation. There are indeed strong economic values maintained by the BLM increasing its wilderness proposals from those now contained in the Draft Environmental Impact Statement.

I appreciate very much this opportunity to comment.

Sincerely,
Mark Meeks
Rev. Mark Meeks

56

251 Gay St.
Longmont CO 80501
May 29, 1982

RECEIVED
JUN 1'82
B.L.M. Montrose Dist.

Mr. Henri Bisson
BLM:POB 1269
Montrose CO 81402

Dear Mr. Bisson:

I learned recently that the BLM is considering a proposal to increase the acreage of wilderness on two fourteen-foot mountains, Sunshine and Red Cloud. I am in favor of such an increase.

I have climbed both of these mountains and believe that views from the top and access to them is a valuable experience to preserve for our progeny. Also they appear to qualify as wilderness despite some past mining on them.

Thank you for considering my favoring of wilderness designation for Sunshine and Red Cloud mountains.

Yours truly,
Kaye Bache-Snyder

57

RECEIVED
JUN 1'82
B.L.M. Montrose Dist.

May 28

John Spezia
Box 2255
Steamboat Springs
Colorado, 80477
(303) 879-1289

BLM,

Since I was not able to attend the BLM public hearing on May 13th, I would like to respond to the issue at hand and have this letter introduced into the Testimony on the proposed Wilderness areas.

I have guided, shued, climbed and used these proposed wilderness areas in my work with adults and youth since 1978

The areas around Red Cloud, Sunshine, Handies, American Flats and Animas Canyon are excellent wilderness environs for people to experience the beauty of our environment. But, also to grow personally, expand their awareness and be a more productive and aware individuals in our society. This is a direct result of the programs I direct & instruct in these areas. The wilderness environment provides a great deal of insight and perspectives for our nation.

We must preserve and provide this intangible heritage that cannot be reproduced once it is gone.

I urge you strongly to give wilderness status to 40,000 acres in the Redcloud area, 18000 acres in the Handies area.

Copies of this letter are being sent to Senator Hart & Armstrong.

Sincerely, John W Spezia

58

1209 Remington
Ft. Collins, Colo 80524
May 26, 1982

RECEIVED
JUN 1 82
B.L.M. Montrose Dist.

Montrose District
Bureau of Land Management
POB 1269
Montrose, CO 81401

Dear Sir:

I realize that government bureaucrats are usually not politically astute, but I really did not expect you people to be so artless as to actually recommend the destruction of such valuable wilderness land as the BLM has in the San Juan range, especially in a year in which the Republicans are going to have to weather as much biting critical scrutiny as they have ever had to since the formation of their party. Though this year will probably not rank quite as high in importance as those of the Harding administration scandals or the Hoover debacle, any action you take in failing to secure wilderness protection for the following areas will virtually ensure a victory for Ray Kogovsek this year and an even more pro-protection candidate in the future, as well as seriously endangering Bill Armstrong's re-election campaign in 1984.

The following have more obvious value, especially to residents of flatland states such as in the midwest, than practically any other BLM land in the country. I would therefore like to request that you place in your record for the wilderness hearings of May 13 my recommendations of full wilderness classification for the following study areas.

HANDIES PEAK, ANIMAS CANYON, AMERICAN FLATS, REDCLOUD PEAK-SUNSHINE MTN.

In addition, the following BLM areas contiguous to already existing wilderness are of sufficient merit to be classified as wilderness.

BILK HAWK GULCH, FRIENDS-SHARING RANCH, LARSON LAKE, SLUMGULLION SLIDE, WHITEHORSE CONTIGUOUS.

Yours in the hope that one word to the wise will be sufficient,

Bradley Edwards

59

RECEIVED
JUN 2'82
B.L.M. Montrose Dist.

Dear Sir:

I am writing in regard to the Wilderness Study Areas in the San Juan Mountains. The small areas you have recommended for wilderness protection are ridiculous! I strongly feel that the entire WSA areas should be protected and even expanded. The San Juans in my opinion are the only real wilderness area left in Colorado and are only matched in size in a few places in the country. The only use that would really be affected would be possibly mining. The timber in this area is generally not commercial. I am an active hunter, fisherman, horseman, backpacker and climber of the 14 fourteeners. Also, I am a businessman in middle management at a 500 million firm. I'm starting to question my sanity for supporting the Republican Party all these years and I'll be much closer to the wilderness boundaries. Thank you. Yours truly, Mark

60

May 29, 1982

Montrose District BLM
Box 1269
Montrose, Colo. 81401

RECEIVED
JUN 2'82
B.L.M. Montrose Dist.

re: San Juans Mtns. Wilderness Areas

Gentlemen:

I have just reviewed the draft Environmental Impact Statement regarding the Wilderness Study Areas in the San Juan Mountains. While I am impressed by the amount of work which obviously went into the report, I am distressed at the limited acreage recommended for wilderness. The BLM areas encompassed by this report are clearly some of the most outstanding pristine areas in Colorado and, indeed, the entire nation.

In my eyes the entire Handies Peak area and Sloan Lake Basin are magnificent candidates for the fullest protection afforded by wilderness designation. The totality of the Redcloud Peak WSA, including A Spire and Owl Gulches, are likewise superbly suited for wilderness recommendation to the Congress. There is no cogent reason to deny the fullest protection to all of these WSAs. Moreover, the three units of the Animas River Canyon would make fine additions to the existing Weminuche Wilderness.

I sincerely hope you will take serious note of these comments.

Cordially,
Henry N. Ervin

cc: Rep. Patricia Schroeder
Sens. Gary Hart and William Armstrong

61

BLM
Box 1269
MONTROSE, COLO. 81401

RECEIVED
JUN 3'82
B.L.M. Montrose Dist.

DEAR SIRS,

I WAS UNABLE TO ATTEND THE HEARING MAY 13 RE GARDING THE WILDERNESS STUDY AREAS IN THE SAN JUAN MOUNTAINS BUT I DO WISH TO EXPRESS MY CONCERNS. I HAVE CLIMBED HANDIES, RED CLOUD, SUNSHINE AND CAMPED NEAR THE PEAKS. THIS IS A BEAUTIFUL AREA, AND I SUPPORT THE PROPOSAL THAT 40,000 + ACRES OF THE RED CLOUD AREA AND 18,860 ACRES OF HANDIES BE INCLUDED IN THE WILDERNESS DESIGNATION. THE PEAKS ARE SPECTACULAR AND SO ARE THE SURRANDING VALLEYS. THESE, TOO,

61

SHOULD BE PRESERVED THE PUBLIC.

SINCERELY,
Maureen C. Canavan

62

1424 Acacia Dr.
Colorado Springs, Co
80907
June 4, 1982

Dear friends:

This note is to urge you to work for wilderness protection for the Sangres, including Handies, Red Cloud, and Sunshine Peaks; and Alpine and Owl Gulch, American-Tiste, Animas Canyon.

Thank you for helping save our wilderness areas.

Sincerely,
Mrs. K. A. Kilgore

63

Gabriel Nelson
1935 Redgrass
Colo Springs Co 80916

RECEIVED
JUN 7'82
B.L.M. Montrose Dist

Bureau of Land Management
Montrose District
Box 1269
Montrose, Colo. 81401

June 3, 1982

Dear Sirs,

As a frequent hiker and camper in the Sangre de Cristo Mountains, I would like to voice to you my opposition to the so-called "wilderness-on-the-Rocks" proposal for part of the San Juan

63

-2

Mountains. I would like you to back increased protection for Hardies Peak, Rito Alto Peak, Sunshine Peak, Animas Chief, American Flats, Alpine and Cat Gulch

Thank you very much for considering this letter

Sincerely,

Gabriel Nelson

64

DAVID F. STEINHOFF

1002 GUNNISON AVE
GRAND JUNCTION Colo
81501

RECEIVED
JUN 9'82
B.L.M. Montrose Dist

To: Henri Bisson
Bureau of LAND MANAGEMENT
Box 1269
Montrose, Colorado 81402

please accept the following comments on the American Flats and Handies peak:

HANDIES PEAK - Southern portion, ie South of Cottonwood Creek, has high wilderness potential. I have hiked up Cataract Gulch and down Cuba Gulch. their Access to the higher country to the South is important. Cuba gulch's steep, lush trail was where I found an eagle feather (altho I have not verified the type of feather, I still have it)

AMERICAN FLATS - ~~was the~~ has an excellent example of Alpine Tundra, if I recall correctly.

Both areas are in a relatively remote area

over →

64

of the state, — one of the few remaining.

64A

I hope these areas are set aside for non-motorized use.

-David F Steinhoff

P.S. I feel the E.I.S. was good but that it lacked a full evaluation of the recreational (non-motorized) potential in certain areas.

Response to Comment Letter 64

64A The areas included in this study are primarily managed for non-motorized recreation. Consequently, the evaluations in the EIS relate specifically to the effects of designation or nondesignation on non-motorized recreation. It appears to be adequately addressed.

65

2934 S Humboldt
Denver, Co. 80210
6/6/82

Henri Bisson
Bureau of Land Management
PO Box 1269
Montrose, CO 81402

RECEIVED
JUN 10 82
B.L.M. Montrose Dist.

Re: WSAs in San Juan Mountains

I am writing to express my disappointment at the recommended wilderness designations in the draft Environmental Impact Statement released on this area. We have got to protect more than just the tops of the high peaks in the San Juans.

Therefore, I support the following alternatives:
- the entire Handies WSA (Alternative 1)
- alternative 3 for Redcloud
- Alternative 3 for American Flats
- Wilderness designation for Bill Hare Gulch, Larson Creek, Weminuche Contiguous, Whitehead Gulch, and Needle Creek.

The mining industry has plenty of land to explore for minerals. They should not have these lands.

Sincerely, Linda Pohle

66

Henry Bisson,

I am very interested in receiving an Environmental Impact Statement regarding the San Juan Mountains that are up for Wilderness Study Areas. I was given your name to write to as a person to contact at the Bureau of Land Management office.

I have spent many enjoyable days in the San Juan Mountains and I am very concerned about the possible development of any of this country. I would greatly appreciate any information you could send along with the E.I.S. for the area. My address is: PERI CHICKERING

530 OGDEN ST.
DENVER, CO
80218

Thank you very much for your time and energy.

RECEIVED
JUN 11 '82
B.L.M. Montrose Dist.

Sincerely,
Peri Chickering

67

261 Little Park Rd.
Grand Junction, Colorado 81503
June 16, 1982

RECEIVED
JUN 18 82
B.L.M. Montrose Dist.

Dear Mr. Bisson:

In regards to the WSAs (Wilderness Study Area) Handies Peak and Redcloud, I wish to participate in the public comment period. I urge the BLM to recommend Wilderness protection for all of the Handies Peak area and 37,500 acres of the Redcloud Peak area which includes Alpine and Owl Gulches.

In Colorado I know of no other BLM lands that reach 14,000 feet, that support alpine vegetation, and that provide the same type of serenity and solitude as some Forest Service lands. BLM land, usually described as parcels of arid, desert-like land, are formidable because of their desolate and tough character. The Redcloud and Handies WSAs suggest that all BLM land is not so. This is not say that desolation and toughness are undesirable characteristics, but the addition of high moutainous areas to the BLM Wilderness lands would be an exceptional exception to any BLM Wilderness.

My personal experience in the Handies and Redcloud areas is minimal, but my attempts to hike there are numerous. Last summer, the abundant rain and my long work hours prohibited the climb on Handies. I'd like to know, though, that these areas will remain in a relatively pristine character and that the BLM will still have wild lands in high places. I believe the only way my wish will come true is if the Congress designates all of Handies and 37,500 acres of Redcloud Peak areas as Wilderness.

The conflicts, stated as significant due to mining interests, are minimal in comparison to need for living pieces of wild land. When the Public Lands Committee comprised of Representatives Kogovsekand Brown and a Representative from Montana, came to hear public comment concerning the Burton bill and Watt-Lujan bill, I testified. I stated that these areas both Wilderness and Wilderness Study areas were important if not merely for their existence, but for their information or genetic material. Their preservation as a gene bank assured the future human generations a chance to explore, contemplate, and grow with an ongoing ecosystem or ecosystems.

I hope you will include this letter as a record of public comment

67

and that I have at least aired you to think about the proposed deleterious deletions in the Handies and Redcloud Peaks WSAs.

Thank you for your consideration.

Sincerely,

Lynn S. Cudlip

copy to: Representative Raymond Kogosvek
Senator Gary Hart
Seanator William Armstrong

68

June 12, 1982

Dear Sir

This letter is regarding preservation of the San Juan Mountain wilderness area.

Have you ever been backpacking or hiking in this area? You need to see it on foot to appreciate it. It's so peaceful and so beautiful to hear nothing more than the sound of your own footsteps and the sound of the wind in the trees when you wake.

RECEIVED
JUN 18 '82
B.L.M. Montrose Dist.

68

(2)

If these areas are no longer wilderness, civilization and industry will infringe and destroy a way of life for the people living there and destroy the beauty of the land. We'll create a "western-slope Denver."

We would also infringe on the animals living in the area and push them into smaller and smaller spaces. Animals become 'vicious' as they fight for self-preservation. The incidence of 'attacks' on people in the area and livestock would rise as they do in national park areas.

68

(3)

Since tourism is one of our state's leading industries, reducing the available wilderness area would reduce the number of tourists and amount of revenue coming into the state.

We all hear about stress these days. By reducing the amount of wilderness area we would be reducing a natural stress outlet both for in state residents and tourists.

There is nothing less stressful than looking up through the trees to see blue sky and to breathe fresh air.

Sincerely,
Carol Mabie [illegible]

69

San Luis Valley Christian Community Services

P.O. Box 984 Alamosa, Colorado 81101 317 State Avenue
303 / 589-3192

June 21, 1982

RECEIVED

JUN 22'82

B.L.M. Montrose Dist.

Mr. Henry Bisson
Bureau of Land Management
Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson:

I understand that you are the person to receive comments about Wilderness proposals.

It is my plan to join others in a backpack trip to the Handies Peak area and in another to the Redcloud Peak area about as soon as the snow melt allows. From that you will know that my concerns are for an area I don't yet know. (But I did thoroughly enjoy doing the Gunnison River last month - Morrow Point Dam cruise, Black Canyon, West Portal, etc).

If the information given me by others is relisble so that I would come to the same conclusions - and I think it is - I hope that Alternative 1 can be put into effect for the Handies WSA and Alternative 3 for Redcloud. I know there are mineral independence considerations, and others, but do not think they are so urgent yet as to require mineral exploration and other activities to spoil or drastically alter these high mountain areas.

Very sincerely,

John M. Wade
(individual)

jw

70

RECEIVED

JUN 22

B.L.M. Montrose Dist.

2034 Main Ave. #203
Durango, Colorado 81301
June 20, 1982

Dear Mr. Bisson:

I would like to recommend that the Bureau of Land Management adopt the all-wilderness alternative for the Weminuche Contiguous, Whitehead Gulch, and Needle Creek wilderness study areas described in your recent report. I have done some hiking in these areas and am somewhat familiar with parts of them.

The current trend in La Plata and San Juan county seems to be the development of large portions of land along U.S. 550 from Durango to Silverton (for example, Tamarron, the Cascade Village condominiums, and the expansion of Purgatory). Therefore I feel it is very important to place forest land in this area in the wilderness system in order to provide adequate wildlife habitat. Placement in the wilderness system would insure that this wildlife habitat would not be developed in the future.

Yours truly,

Diane L. Skinner

Diane L. Skinner

71

RECEIVED

JUN 23'82

B.L.M. Montrose Dist.

June 21, 1982

Mr. Henri Bisson
Bureau of Land Management
P. O. Box 1269
Montrose, CO 81402

Dear Mr. Bisson:

I am commenting on the Draft Environmental Impact Statement for the proposed Wilderness Study Areas in the Gunnison Basin and American Flats/Silverton Planning Units. I am actually surprised at the difference between the number of acres proposed in the All-Wilderness Alternative as to the number in the Preferred Alternative. This is the first difference that was noticeable to me. I'm not sure about the reason. Mineral development or the potential for mineral development is not enough to exclude the area from being wilderness. Much of the area proposed as wilderness is alpine tundra and I wouldn't want mining development up there anyway, wilderness or not. Also, mining is just one aspect of multiple use whereas wilderness satisfies and provides many uses; such as recreation, wildlife habitat, watershed protection and water quality. Even grazing could be utilized under the wilderness act.

71A With regard to heavy visitor use causing impacts on soil, water and vegetation, this could be minimized by the following: (1) Have designated campgrounds away from water sources such as lakes and streams. Backpackers would have to carry water in or carry water from local sources to the campsite. This could alleviate some soil compaction and riparian habitat destruction. (2) Also have a permit system in force if this is possible when visitor use becomes heavy.

Being a one-time resident of Colorado, I realize the controversy between pro and con wilderness issues. I also realize the overuse of many wilderness areas. Perhaps the addition of more wilderness areas will alleviate the stress and overuse of others. Also, there will be no greater legacy that we could leave behind to future generations than the preservation of our wild and beautiful landscapes. Mineral development has its place as well but it has its costs. In a world of fewer and fewer wild and picturesque places, the value of that land becomes higher. We have to really understand what has the greater priority. We cannot continue to take from the earth without putting some things back. I support the All-Wilderness Alternative. Wilderness and recreation could also support a greater tourism industry which means more jobs. This is the environmentally sound way to go.

Sincerely,

Clinton D. Vogel

Clinton D. Vogel
2836 Paseo de los Pueblos, #15
Santa Fe, New Mexico 87501

Response to Comment Letter 71

71A Following Congressional designation of an areas as wilderness, the BLM will prepare a Wilderness Management Plan which would consider and recommend necessary recreation management actions to protect and preserve the wilderness resource values. These would likely consider your suggestions as well as many others depending on the situation.

72

Denver, Colo.
June 22, 1982

B.L.M. Montrose Dist.

Dear Mr. Bisson:

I am writing to comment on the recommendations by the Bureau of Land Management (BLM) for the Gunnison Basin-American Flats area.

I am disappointed in the BLM's recommendations for the Redcloud and Handies Peaks Wilderness Study Areas (WSA). The preferred alternatives would create two very small wildernesses which would protect only the high peaks themselves while releasing the rest of the areas. In the Draft Environmental Impact Statement (DEIS), The BLM admits that this will cause the proposed wildernesses to be adversely affected.

I have been in both of the areas in recent years, and I find that they offer an outstanding opportunity for solitude and primitive, non-motorized recreation. There will be an increasing need for this type of recreation as ever greater numbers of people desire to temporarily escape crowded urban conditions. After the present review of BLM and Forest Service WSAs is completed and the recommendations acted upon by Congress, there will be no further opportunity to protect any more areas as wilderness in Colorado. Thus we need to so designate all of the available areas now, unless there is a compelling reason not to do so for a particular area. I see no such reasons in the Redcloud or Handies WSAs; therefore, I support the all-wilderness alternatives for both areas.

The all-wilderness alternatives would be more appropriate for Larson Creek, Bill Hare Gulch and American Flats, as this would enlarge the existing Big Blue Wilderness.

Weminuche Contiguous, Needle Creek and Whitehead Gulch border the

72

heavily-impacted Weminuche Wilderness. The BLM has wisely recommended that large portions of the latter two WSAs be designated wilderness. Needle Creek is especially important, as it would provide additional protection for one of the more heavily-used portions of any wilderness area in Colorado. I favor the all-wilderness alternative here. I also favor designating more than 375 acres of the Weminuche Contiguous WSA. The preferred alternative for Whitehead Gulch is acceptable.

The arguments against wilderness usually boil down to economics. I.e., wilderness designations preclude the realization of monetary benefits from mining, grazing, timber cutting, etc. It must be remembered that recreation and tourism bring a tremendous amount of money into Colorado each year. One reason that tourists flock to our state is to admire our majestic mountains, some of the prettiest of which lie in the area in question. Preserving as much as possible of this area will help insure an adequate income from tourism and recreation for Colorado for many years to come. It will also insure that at least a few places have clean air, clean water and opportunities for solitude--qualities that will be highly valued in the years ahead.

I would like to thank the BLM for the opportunity to comment on these proposals. I hope my comments are seriously considered in the formulation of the final recommendations.

Yours truly,
Rocky Smith

Rocky Smith
1030 Pearl #9
Denver, Colo. 80203

73

Montrose District BLM
Box 1269
Montrose, CO. 81401

RECEIV
JUN 28 '82
B.L.M. Montrose Dist

Dear Sirs,

Recently it has been brought to my attention that the BLM is recommending the reduction of acreage contained within the WSA's in the San Juan Mtns. I am an avid backpacker and have spent much time in this area. The WSA's bound some of the most beautiful terrain in the state not to mention the "Fourteeners" located on the lands in question. These areas should be treated as one of our most valuable natural resources! People need areas of this sort to "Get Back to Nature". Please donot reduce the size of the WSA's. Thank You

Sincerely,
Ed Loesdon
14130 E. Temple Dr. T-11
Aurora, CO. 80015

74

28 June 82

Montrose District B.L.M.
Box 1269
Montrose, Colorado 81401

RECEIVED
JUN 30 '82
B.L.M. Montrose Dist

Dear Sirs of the B.L.M.:

As a member of the Colorado Mountain Club and as an avid hiker of the wilderness areas, I heartily recommend that the following wilderness areas be protected in their entirety:

(1) Weminuche Area
(2) 37,500 acres of the Redcloud Peak WSA, including Alpine and Avd. Gulches and Redcloud and Sunshine Peaks
(3) all the other WSA's in the area

Thank you for your consideration.

Sincerely,
Deborah Kinsey
12790 E. Bellewood Place
Aurora, Colorado 80015
Phone

75

RECEIVED
JUL 2'82
BLM Montrose Dist

6-26-82
2836 S Linden Ct
Denver, Colo 80222

Bureau of Land Mngmt,
Dear Mr Henri Bisson,

I am most appreciative that I could attend the public haaring you held for folke in the large Denver Metro area regarding the Silverton Wilderness, and that I was invited to comment even tho I had not made prior arrangements. I am 46 and spent my 1st 20 years on a small ferm just inside the woods and lake country 200 miles NW of Mple, Minn, and now find myself living in Denver as of the last 15 yrs. I feel my comments my heve been rendered ununderstandable, due to the spontaneous nature of the moment, and my not being accustomed to public speaking, so I wish to re-present them here.

Campsite partners from E Tenn had more excitement trying to negotiate around the Coal mine guards on leased BLM land NW of Meeker a couple deer seasons ago than they did hunting. There was no visible conflict of interests, so it appears that once a private group attains control of land they totally exclude others. I feel every inch of land that is retained for all citizens, will be much appreciated now and in the future.

The minerals will still be there, even if no alternativae develope and our Countrys welfare hinges on thier supply. Mining them soon will instead consume them rather wastefully, to be gone forever. As with gasoline, while it was low cost, Autos were mfg that were wasteful in thier inefficiency. Those being our only choice, we all purchased them and squandered our worlds non-renewable resource. Now that we are hurting, autos and drivers became much more efficient and conservative. Let's become efficent with minerals NOW, before the last quantity has been consumed and unrestoreable beauty has been destroyed.

Thanks for your consideration,
Ralph E. Palmer

76

BLM Montrose Dist

To whom it many concern,

I am writing this letter to express my opinion of the may 10 hearing in Lake City and my opinion of the study areas under consideration for wilderness designation in the Lake City area.

The first thing I would like to make clear is; everyone who lives in the Lake City area isn't against wilderness areas as you seem to think.

There are many proponents of wilderness here, but I'm afraid they don't realize the value they have to lose as clearly as those who perceive a direct financial loss from the Wilderness areas. The people who were protesting the wilderness areas at the last hearing all have one thing in common: their ownership of numerous unpatented mining claims in the areas in question. Though there were many reasons mentioned, (patriotism, the economy etc.) these people were all there primarily to protect their own monetary interests.

I very much favor the idea of wilderness areas. I believe that in the future, these small areas, (relative to the total area of the country) of "pure" wilderness will become increasingly valuable assets to our country by providing wildlife habitat, watershed protection and increased tourism, (our main industry). It would be a shame to pass judgement over these areas forever, just because of a few very vocal people's greed

76

(2)

These lands belong to everyone in the whole country and should be judged accordingly.

If there were a mineral here that was desperately needed, congress could reverse themselves as was done this year for the Cobalt deposits in Idaho. This situation is unique, in that a decision one way is reversible but a decision to open up the area is irreversible.

I have some comments regarding the areas under consideration, many of which I've hiked & camped in. I would also like to give my reactions to your recomended alternatives for these areas.

I was very disapointed in the small size of your recomendation for the red cloud area. It's almost all above timberline. There are some beautiful untouched valleys which are included in your Conflict Resolution #1, while at the same time, the alunite deposit is excluded. I think you should change your recomendation to the Conflict Resolution 1, (One). While there are mining claims & state owned minerals there, none of the deposits have been proved.

Regarding the Handies Peak area; why the long cherry stem into American basin? I think it should be cut off at least ⅓ way. The only reason there's a trail there is sheep grazing, and I would like to see you drive up the road as far as you've got it marked on the map. Have You ever been there?

76A

76

(3)

I question your substantial cut of the American Flats area. There doesn't seem to be much mineral interest, so why not add as much as possible to the Big Blue area?

Likewise, I was disapointed in your Recomendations to drop the Bill Hare gulch and Larson Creek areas completely. Your attitude seems to be "why make it wilderness if no one's interested in mining it?" To this I would have to say "If there's no interest in developing the area, why not make it wilderness". Your "manageability" alternatives for these areas are a great chance to enhance the Big Blue wilderness area.

I have not been in either the Needle Creek or Whitehead gulch areas, but your recomendations seem to be sound. It seems to make sense to add on to existing wilderness areas when possible.

I was disappointed in the size of your recomendation for the Wiminuche contiguous area. I think that it is too small. I have hiked in that area and there is a lot more area which meets the wilderness criteria. Also, why exclude the small area in the South east corner?

76B

I believe that the wilderness areas are an important resource and will be more more valuable every year. I hope that you will bear in mind that when an area is declared wilderness, it is a reversible decision, but when an area is opened to development it is a permanent decision. It would be better to err in the direction

76

(4)

I making too much wilderness rather than not enough.

Thanks you very much for your time and patience in reading this letter

sincerely,

Henry Woods
Lake City

Respoose to Comment Letter 76

76A The cherry-stem was drawn to exclude the eotire road io this area from the WSA. The proposed action for Haodies Peak is to shorteo the cherry-stem and include the upper part within the proposed suitable area.

76B The southeast corner of BLM lsod was designated by Congress in 1974 as a part of the Weminuche Wilderness Area.

77

101 S. 88 Ave., #I-113
Thornton, Co. 80229
July 2, 1982

Bureau of Land Management, Montrose Diptrict
P.O. Box 1269
Montrose, Colo. 81401

Re: San Juan Wilderness Study

Dear Sirs,

I have read the Environmental Impact Statement Draft, which you sent me, and have talked with a number of people about this, including geologists, ecologists, and other professionals in the natural science fields. I was unable to attend your May 13 hearing at the Denver Botanic Gardens, and am therefore writing.

I urge you to consider a larger section of land for wilderness protection than you have recommended from your review of Wilderness Study Areas of the San Juan Mountains.

I have spent considerable time in the part of Colorado affected. As I have understood or observed, mining claims have not led to the bounty of minerals that were hoped for. Furthermore, you would be endangering some of the most valuable open areas of the West were you to exclude from full wilderness protection the Ariarico Flats and Ariarico Canyon; Redcloud, Sunshine, and Handies Peaks, along with a significant amount of surrounding land.

Your recommendation for 11,190 acres of the 20,577 in Redcloud area, plus only 7,215 of the 14,060 acres in the Handies area, would, in my view, be destructive for future generations. I do urge you to reconsider.

Sincerely yours
Philippa Eggleston
Philippa Eggleston

cc to Sen. Wm Armstrong,
Sen. Hart, Rep. Wirth

78

648 Stover
Fort Collins, CO 80524
July 2, 1982

Montrose District BLM
Box 1269
Montrose, CO 81401

Dear BLM Staff:

I'd like to express my feelings io regard to the draft Environmental impact Statement on the San Juan Mountaios.

I've backpacked io the Weminuche Wilderness and really cannot express the awesome beauty of the area--except to say that it made me feel that Colorado's mountains are truly special. I would love to see additions made to this wilderness area, and i feel that the Animas River Canyon would be a natural addition for you to recommend.

I haven't yet had the pleasure of hiking in the Handies or Redcloud Peak areas, but i look forward to doing so someday. I understand that the draft EiS recommends protection for only the tops of these peaks, which i feel is terribly inappropriate. Not all people are able to reach the tops, so are they to be denied the beauty and peacefulness of a wilderness area? And as for the people who do reach the tops, must their experience begin and end with the sights and sounds of development, leading them to wonder what effects are taking their toll on the wilderness area in between?

I spent the first 21 years of my life in indianapolis, Indiana and have also lived in Detroit, Michigan. Perhaps coming from that environment (undesirable, at least io terms of mountains and wilderness) has made me fully appreciate what we have here io Colorado and want to keep it beautiful and pristine. If we don't fight to keep it now, it surely won't be around for anyone else to ever take it for granted.

I attended the public hearing held in Denver in May, but did not speak. The one thing I would have liked to say, in response to the people who spoke in favor of mineral development, is this: if our nation's energy needs are at a point where we find it crucial to have the relatively small amount of minerals found in this area of the San Juans, then i am afraid it is already too late; the mineral deposits here will not save us or sustain us for long, but only postpone the search for a real solution to our energy problems.

in summary, I write to urge you to reconsider the original recommendations and add to the wilderness acreages. Think of what is at stake here in Colorado--can you possibly, in all good conscience, give it up for the monetary interests of the mining industry? i sincerely hope not.

Yours truly,

Janet McLachlan

Janet McLachlan

cc: Representative Hank Brown
Senator Gary Hart
Senator William Armstrong

79

RALPH E. CLARK III
[illegible] EAST GEORGIA AVENUE
GUNNISON, COLORADO 81230
[illegible]

RECEIVED
JUL 7'82
B.L.M. Montrose Dist.

July 5, 1982

Mr. Henri Bisson
Project Manager
Bureau of Land Management
P. O. Box 1269
Montrose, Colorado 81402

Re: Comment on draft EIS for proposed wilderness designations in Gunnison Basin and American Flats / Silverton Planning Units.

Dear Mr. Bisson:

Thank you for the opportunity to review and comment upon the draft environmental impact statement entitled Proposed Wilderness Designation of the Wilderness Study Areas Within the Gunnison Basin and American Flats / Silverton Planning Units of the Montrose District, Colorado. The following are personal comments from my perspective made following my examination of the document and other relevant material. The comments also reflect my personal experience of some of the areas considered for wilderness designation in the environmental impact statement.

The draft is exceptionally well written and very well organized considering the number of specific areas addressed and the diversity of alternatives presented for each area. The graphics, especially the attached map, are very helpful in presenting the context and relationships among the features of the general area. Also valuable are the discussions, with supporting details, of the recreational sector within the area's economy.

In summary the draft rightly argues that the decision to be made is one of trading off and adjusting the development of specific resources so as to achieve a "best balance" of resource values (page ix of the draft). With regard to this I would urge the expansion within the statement of the following issues. Though touched upon in the statement, their importance to the future of the units merits their receiving more attention despite their being difficult to handle.

a. By climate and topography the studied areas are among the more promising locations for extensive water yield augmentation in the Colorado River Basin by means of weather modification. In the balance net values of such water downstream may exceed net values from both mineral and recreational development within the studied areas. With respect to seeking the best balance, wilderness resource retention and wilderness recreation appear more compatible with water resource quantity and quality enhancement than does mineral resource extraction. The BLM's Wilderness Management Policy (September, 1981) suggests a needed csution and reluctance in allowing weather modificstion over wilderness areas. The coming necessity to consider this form of resource development is summarized in two recent publications available from the law firm of Musick and Cope in Boulder, Colorado. They are entitled: An Introduction To Colorado Water Law (1981) and Briefing Paper On Critical Water Supply Variables For Energy Development In The Upper Colorado River Basin (1982).

79

Mr. Henri Bisson
Bureau of Land Management
Montrose, Colorado

Re: Comment on wilderness area designation, draft EIS.

The former publicstion in an appendix indicates current valuations for municipal and industrial water supplies. The latter publicstion provides a summary of the reasons for anticipeting proposals for extensive basinwide weather modification to sugment available supplies of water.

79A

b. Discussion of resource trade-offs and the balancing of resource values raises several related issues. The first concerns the interpretation of the evidence of mineral potentials - the favorable conditions for occurance used to evaluate specific areas in Appendix 3.8 of the draft. Much of the discussion of minersl resource values within the draft is in terms of what may be seen as hoped-for possibilities. Evidence of high mineralization or favorable conditions for occurance ought not be equated with the suggestion that if present a deposit would lead to the undertaking of an extraction and processing project which would remain economically viable and in operation for the duration of the project's intended lifespan. Besides the determination of a deposit there are other external and non-mineral factors which must be considered before the possibilities of mineral resource development can be assessed (a useful summary of these factors snd their implications can be found in K. Thompson (1981) Availability of Nonfuel Minerals, Futures v. 13 n. 6, December, pages 513 - 517). Factors to be considered include: technological advancement, the costs and svailability of substitutes, political marketing strategies of producing nations, capital requirements and availability, snd structursl changes occuring within economies. The problem presented to the preparation of this environmental impact statement is that of how to compare uncertain resource values whose development is uncertsin as well with relatively more certsin resource values whose existence is known and whose development is at hand. The mineral resource values are of the former type and the wilderness reaource and wilderness recreation values are of tha latter type. This issue might usefully be discussed slong with the presentation of data on the contribution of recreation to the economies of the two counties in which the wilderness study areas are located.

79B

A second and related issue concerns the concept of "foregone values" (psge 72 and elsewhere in the draft). A mineral resource in the ground at the time of wilderness designation will, for all practical purposes, remain there during the period of wilderness designation. Its physical existence will not be lost nor diminished by management of the area for retention of the wilderness reaources present. However, the converse is likely to occur. The wilderness resource is likely to be lost by exploration and extraction of the mineral resource within the managed area. If not lost, the wilderness resource can be significantly diminished by mineral resource development activity.

What may be foregone with regard to mineral resources is economic use or vslue at any particular time. However, this is difficult to determine because of the uncertainties noted above regarding the actual undertaking mineral resource development. This point can also be msde with reapect to the criteria given for establishing a "valid" right to a claim on a mineral deposit in a designated wilderness area (page 72 of the

79

Mr. Henri Bisson
Bureau of Land Management
Montrose, Colorado

Re: Comment on wilderness area designation, draft EIS.

draft and within the BLM's Wilderness Management Policy section on minerals management). In terms of the criteria it is difficult to define the conditions under which it is prudent to develop or inveat in a mine and under which it might be expected that a profit might be made from doing so over the lifespan of the project. Given that the physical resource remains the same and the external conditions csn change, the "right" to a claim (in reality, if not in law) may pass in and out of validity over the course of time. Likewise, over time there may and may not be economic values foregone by wilderness designation. If society does not want s product of mineral extraction from a particular location at a price which reflects the costs of its sppropriate extraction, then it would appear that no resource values are foregone with respect to the minerals at the location.

The waxing and waning of economic values in the mineral resources pose recognized problems for those attempting to undertake projects for their extraction. Further, the changes in value and in the other conditions affecting the viability of the extraction projects have the capacity to present a profound problem to any community which must respond to the undertaking of an extraction project. Recently such changes have contributed to the closure of many such projects in the western states. In turn this has resulted in many streases within the affected communities.

In their desire for mineral resource development, some communities may not fully recognize the uncertainties associated with resource extraction projects. Such community difficulties sssociated with mineral resource development might be seen in terms of costs and values of other resources foregone, if they occur and must be coped with by the society. Like the costs of mineral resource exploration, the costs to communitiea for coping might be either regarded as expenditures to be minimized or as the normal costs of every-day business and tha price of continued existence as a corporation or a community. The discussions in the draft of what is foregone, by whom, and with what implications might be usefully expanded for the banefit of those balancing rasource values and for the benefit of the communities affacted by such decisions.

c. The following 1981 publications from the Intermountain Forest and Range Experiment Station might be useful in addressing perceived problems associated with recreational activities within the study areas:

R. C. Lucas and T. J. Kovalicky, Self-Issued Wilderness Permits as a Use Measurement Syatem;
R. C. Lucas, Redistributing Wilderness Use Through Information Supplied to Visitors;
R. E. Benson and J. R. Ullrich, Visual Impacts of Forest Management Activities: Findings on Public Preferences;
D. N. Cole and E. C. S. Schreiner, compilers, Impacts of Backcountry Recreation: Site Management and Rehabilitation - An Annotated Bibliography; and
L. Petersen, Trends in Recreational Use of National Forest Wilderness.

79

Mr. Henri Bisson
Bureau of Land Management
Montrose, Colorado

Re: Comment on wilderness area designation, draft EIS.

Conclusions and explanations of some of the research projects' failures presented in these publications offer lessons for the management of recreational activity on the designated areas - especially in those places where there is little or no buffer zone between the wilderness and other lsnd uses.

Finally, I would urge wilderness designation for the study areas sa indicated by the Wilderness Manageability Boundaries except for the American Flats, Whitehead Culch, snd Weminuche Contiguous Study Areas for which I would urge designation for the areas indicsted by the Study Area Boundaries. The draft sets forth the exceptional wilderness qualities of all the study areas. The boundaries I would urge provide a grester diversity of recreationsl opportunity and they would retain foreground scenic qualities.

At the present time and for the foreseeable future, the viable development of mineral resources within the study areas sppears very uncertain. It is likely that society will not want the products of mineral extraction, even of alunite, from locstions within the study areas at a price which reflects the coats of sppropriate extraction. In the absence of mineral resource development, the physical resources will remain and their economic valuas may not be foregone. Meanwhile, a best balsnce of the resource uses can be formed to provide continuing steady growth to the affected communities, to psrtly satisfy tha growing and evident demands for the recreational experiences available within the designated wilderness areas, and perhaps provide increased quantities and qualities of water to the Colorado River Basin.

Respectfully:

Ralph E. Clark III

Response to Comment Letter 79

79A In the final EIS we have attempted to clarify the relationship of mineral potential and the other factors involved that might ultimately result in a situation where development would occur.

79B By withdrawing areas from mineral entry the mineral potential of that area is foregone for future use for all practical purposes. We have attempted to clarify in the final EIS the fact that many factors would have to come together before actual development would occur.

80

RECEIVED

B.L.M. Montrose Dist

81

Donald E. Potter, M.D.
1426 Lombard Avenue
Canon City, Colorado 81212

6 July 1982

RECEIVED
JUL 7'82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Project Manager
Bureau of Land Management
P. O. Box 1269
Montrose, Colorado 81402

Dear Mr. Bisson:

I have read thoroughly the Draft Environmental Impact Statement for the Gunnison Basin and the American Flats - Silverton Wilderness. This document seems relatively well prepared and is interesting to read, except for frequent redundencies. One area of apparent error is Table 3.9 as it does not correlate with the text (see pages 41 and 47).

I have hiked and traveled near all these areas and feel strongly regarding the alternatives for these WSA's. Specifically, I would ask the BLM to recommend:

- all of the Handiea Peak WSA for wilderness
- the Wilderness Management Alternative for Red Cloud Peak WSA as I feel these two areas should include not only the tops of the 14ers but the surrounding land
- full inclusion as wilderness of the remaining WSA's (American Flats, Bill Hare Gulch, Larson Creek, Weminuche Contiguous, Whitehead Gulch, and Needle Creek) as they would add substantially to other existing wilderness areas (Big Blue and Weminuche Wilderness Areas), providing access and continuity.

Thank you.

Respectfully yours,

DEP:rmp

CC: Senator William Armstrong
Senator Gary Hart
Representative Ray Kogovsek

82

June 6, 1982

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, Colorado 81402

RECEIVED
JUL 7'82
B.L.M. Montrose Dist

Dear Mr. Bisson,

I have just returned from a 3 day back-packing trip in the Redcloud Peak area. I have previously climbed Handies Peak and travelled through much of the San Juan area. I feel that I must protest your decision to limit the size of these two areas to 11,140 acres and 7,120 acres. These much smaller areas than originally proposed would basically limit the proposed wilderness areas to that found above timberline. That in turn leaves a very strong possibility that one of the most beautiful areas in the state would have its scenic values destroyed by timber and mining concerns.

I was born and raised in Grand Junction. I have camped, hiked, and climbed in most of Colorado, and in Wyoming, Montana, Idaho, New Mexico, California, Washington, Oregon, Utah, and Canada. I have never found an area with more stunning views

82

of close and distant peaks, snow fields, steep tree-studded slopes and clear mountain streams than that seen from the summits of Redcloud, Sunshine, and Handies Peaks.

These areas also fit the bill when it comes to opportunities for solitude. Outside of the small group I travelled with, I saw nine people in two days, and this was the 4th of July week-end! By comparison, one can hardly find a place to camp on Grand Mesa at this time of year, let alone hope for some peace and quiet.

In conclusion, I strongly urge that you reconsider and recommend the All-Wilderness Alternatives of 40,575 acres for Redcloud Peak and 18,860 acres for Handies Peak. Possible mineralization is not sufficient reason to exclude the areas that help make these two proposed wilderness areas so attractive.

Sincerely,
David R. Purcell

David R. Purcell
2817 Elm Ave
Grand Junction, CO
81501

83

Mailgram
western union

RECEIVED
JUL 7 82
B.L.M. Montrose Dist.

HENRI BISSON
BUREAU OF LAND MANAGEMENT
PO BOX 1269
MONTROSE CO 81402

PERSONAL COMMENTS ON DRAFT EIS FOR RED CLOUD WSA ETC. VISITED RED CLOUD WSA OVER JULY 4TH WEEKEND, CAMPED IN SILVER CREEK AND ALPINE GULCH DRAINAGES, CLIMBED RED CLOUD AND SUNSHINE PEAKS. WAS MUCH IMPRESSED BY SCENIC, SOLITUDE, WILD LIFE (ELK, GROUSE, RAPTORS) AND OTHER WILDERNESS ATTRIBUTES OF THIS WSA. AM DISAPPOINTED THAT ALPINE GULCH AND ADJACENT AREAS ARE EXCLUDED IN PREFERRED ALTERNATIVE. THEY ARE EVEN MORE SCENIC AND WILD THAN SILVER CREEK DRAINAGE. AM NOT IMPRESSED BY EXCLUSION FOR ALUNITE RESOURCE. SINCE I UNDERSTAND THAT ALUNITE IS NOT NOW, AND WILL NOT BE FOR SOMETIME, A RESOURCE OF SIGNIFICANT ECONOMIC VALUE. FINAL EIS SHOULD MORE CLEARLY DELINEATE VALUE OF THIS DEPOSIT AND HOW LIKELY ITS DEVELOPMENT WILL BE. HAS THIS MINERAL BEEN EXPLOITED ELSEWHERE IN THE U.S? WHAT ARE THE RELATIVE ECONOMICS OF ALUNITE VERSES OTHER MORE ACCESSIBLE ALUMINUM SUPPLIES? I URGE THE BLM TO CONSIDER AT LEAST THE CONFLICT RESOLUTION NUMBER 1 ALTERNATIVE OR WILDERNESS MANAGEMENT ALTERNATIVE MORE SERIOUSLY.
KIRK CUNNINGHAM

2243 EST
MGMCOMP MGM

8241 81/78

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL-FREE PHONE NUMBERS

84

1201 Adams
Denver, CO 80206
5 July 1982

RECEIVED
JUL 8'82
B.L.M. Montrose Dist.

Mr. Henri Bisson
Bureau of Land Management
P.O. Box 1269
Montrose, CO 81402

Dear Mr. Bisson:

It was the spring of 1979 when I first visited the Gunnison Basin/American Flats area, and I remember being amazed at the time to learn that the areas were administered by the BLM. They are surely unlike the areas one would picture when thinking of BLM areas.

Having visited the areas it was understandable to me when they were included as BLM wilderness study areas. What is not understandable to me is that the BLM would only suggest 35% of this area for wilderness protection.

It is my belief that the entire Handies WSA should be recommended for wilderness (alternative 1) and that alternative 3 should be followed for Redcloud (37,530 acres) and alternative 3 for American Flats (1,505 acres).

84

Bureau of Land Management (cont'd) 5 July 1982

Wilderness is a resource which I can use (and have used) and which can in turn be used by my children (and has been used by them) and will still be left to succeeding generations. The "pie in the sky" mining proposals would benefit only a chosen few, and even them for only a short period of time.

Sincerely,

Don Thompson

85

July 6, 1982

Dear Mr. Bisson, (Montrose Dist.)

I am writing to you with reference to the Red Cloud Peak Wilderness Study Area. In particular I would like to comment on Conflict Resolution (11).

Recently I visited the Red Cloud Peak WSA. We climbed up Silver Creek, crossed the ridge, and descended down Alpine Gulch. One of my greatest enjoyments of the trip was reaching the top of the ridge and viewing the alpine basin of upper Alpine Gulch. We saw no signs of human activity or development. The tundra meadows, the cascading waterfalls, the whole area I could see was untouched. Let me say that,

85

if the edge of the wilderness was on the top of the ridge, I would feel very cheated if I looked down to see roads, buildings, and trucks. I feel that enjoying wilderness includes the sense of solitude and not being able to see development. Climbing a high ridge in the wilderness only to see roads and mines in the meadows on the other side would be disheartening to say the least.

If the alunite deposit on Red Mountain must be developed, I would urge that it be restricted so that the wilderness does not end so unnaturally as it does in Conflict Resolution (11).

Thank you for your time.

Sincerely,
Steve Bortz

86

JUL 8'82

B.L.M. Montrose Dist.

Dear Sir,

I'm writing to you to express my concerns for the present recommendation of the Sunshine-Redcloud mountain wilderness area. The area presently being recommended for wilderness designation is far to small to ensure its continued desirability for recreational use. To grant wilderness designation only for the rocky area around the peaks and not protect the surrounding forrested area viewed from these peaks is senseless.

Besides their visibility, the areas to the north and west of the peaks offer unique recreational opportunities. On a recent hike, I came out alpine gulch and was very impressed with the beauty of the area. There were many signs of elk as well as a great diversity of wildflowers. In fact, the wilderness qualities of the various gulches around this area exceed those of the peaks themselves. To my mind it would be inexcusible to allow these areas to remain open, especially considering

86

that the mineral value of the area is at best marginal, given the increased use of wilderness land for recreational purposes, these lands are much more valuable for the solitary wilderness experience they provide, than their limited mineral resources.

Sincerely yours

Richard F. Gorte
1938 Spruce #4
Boulder, Co. 80302

SUSAN DAEMELMAN
745 20 ST APT 1
BOULDER CO 80302

Mailgram

4-245CI0CCL3 07/07/82 ICS IPWUTZZ 0CR GLVR
3034411270 MGM TDMT BOULDER CO 67 07-07 0430P EDT

88

MINISTRY THROUGH COMMUNITY DEVELOPMENT

CCS

July 7 1982

RECEIVED
JUL 9'82
B.L.M. Montrose Dist

Montrose District, Bureau of Land Management
2465 So. Townsend
Box 1269
Montrose, Colorado 81402

Dear Sirs:

I climbed Redcloud and Sunshine Peaks last weekend. It was a very rewarding experience. I saw in the hands of others in the party the book giving information about this area along with other areas in the Montrose District, as well as the map showing staff recommendations and more extensive areas recommended by others for Wilderness designation. To my regret, I didn't get a copy of these materials and find they are not to be had in the office here in Alamosa.

As I remember what I saw on the pages the staff recommendation covers mostly the areas above timberline. That is, of course, a great deal better than none at all. However, I do think that a somewhat larger area should be set aside. Considering the mineral exploration which has been done in the area over the past century, I doubt very much that making an area somewhat larger than the peaks would threaten our national mineral independence.

On Redcloud or Sunshine Peak you have a feeling of solitude, of being away from and above it all that is important to many persons. Taking the whole year into consideration, quite a range of primitive area recreation is possible, i.e., the streams, the wooded areas, the higher areas, the birds, marmots...and the tundra wild flowers...being among the assets.

A major additional point is that the area is unspoiled - there are very few traces of human use except to mention the inconspicuous foot trails. In fact, I don't remember seeing any traces...or any litter. There is a "jeep" road maybe half a mile up from the parking area at Silver Creek, but it would rapidly vanish if allowed to.

My own use would be summer, at which time photography is super, but for someone into fishing or snowshoeing or cross country skiing the area offers a lot. In sum, we don't have many outstanding areas of high mountain wilderness to equal Redcloud; we can certainly afford to set it aside as wilderness for the foreseeable future; we should do so for the sake of our kids.

Sincerely,
John M. Wade

John M. Wade (writing as an individual)

San Luis Valley Christian Community Services

P.O. Box ~~1329~~ 984 Alamosa, Colorado 81101 317 State Avenue
303/589-5192

87

RECEIVED
JUL 8'82
B.L.M. Montrose Dist

MGMPT 81602M
BUREAU OF LAND MANAGEMENT
PO BOX 1269
MONTROSE CO 81402

RED CLOUD WSA BLM PREFERRED ALTERNATIVE TOO SMALL. EXCLUDES EXCELLENT WILDERNESS IN WSA. ALPINE GULCH PROVIDES OUTSTANDING SCENERY, PRIMITIVE RECREATION, AND SOLITUDE. THE OLD MINING REMAINS DO NOT DETRACT SIGNIFICANTLY. URGE ADDING AT LEAST ALPINE GULCH TO PREFERRED ALTERNATIVE. EXPLANATORY LETTER TO FOLLOW.

YOURS TRULY
DONALD H DEANE PO BOX 1625 BOULDER CO 80306

1505 EDT

MGMXMD MGM

8241 81/7M

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

89

RECEIVED
JUL 9'82
B.L.M. Montrose Dist

Laurie Thayer
650 Arapahoe #1
Boulder, Co, 80302

Montrose BLM
Box 1269
Montrose, Co., 81401

Dear Sirs/Madams,

It has just been brought to my attention that only 11,190 acres of the 40,575 acre Red Cloud WSA had been recommended by your agency as a final wilderness area. I have hiked extensively in Alpine gulch and up to Red Cloud and Sunshine Peaks, I can say I know this area to be fantastically beautiful and a prime wilderness area. It is beyond a doubt some of the BLM's finest wilderness acreage in the state of Colorado. I find it tragic that so little has been recommended by your agency.

Hardies and American Flats are also favorite hiking wilderness retreats for myself and my family & friends. American Flats offers a "mellow" easy hike for older or less experienced hikers, being a flat alpine tundra. It is also a fine representative of this type of rare and fragile ecosystem.

Please save the few remaining spots of beauty and wild America for ours and future generations, please protect them.

Thank you,
Laurie Thayer

90

4081 B Ridgeway
Los Alamos, NM 87544
July 7, 1982

Bureau of Land Management
Montrose, Colorado

Dear Sir.

I visited the area around Redcloud Peak over the July 4th weekend and found it to be an area of incredible beauty in its present state. I urge the BLM set policies and maintain areas such as this in their wilderness state rather than allowing them to be developed for mining potentials.

Sincerely,
Connie Sheridan

91

Mr Dave Dixon
BLM Box 269
Montrose, CO 81402

RECEIVED
JUL 29 82
B.L.M. Montrose Dist.

Dear Mr Dixon,

I am writing concerning the proposed reduction of Red Mtn Peak WSA from 40,575 acres to a mere 11,140 acres, and that of Mendicant Peak WSA from 18,860 acres to 7,120 acres with only two percent of the lower forty-eight designated as wilderness at present now the proposal would further the reduction and destruction of our beautiful country and heritage.

Sincerely, Dave Smock

92

June 1982

Dear Sir:
I would recommend the following areas for wilderness designation:
(1) Alternative #1 - Handies (USA)
(2) Alternative #3 - Kidcland (USA)
(3) Alternative #3 - Amazon Flats, Bull Hars Lizard Larson Creek, Weminuche Contiguous Whitehead Gulch + Needle Creek.

Sincerely, P Kline

SUPPORT DATA

LIST OF PREPARERS

Title	Name	Degree and School	Experience (Years)	Sections for Which Responsible
Team Leader	Lance Nimmo	BS Forestry University of Montana	9	All
	Barry Tollefson	BS Recreation Colorado State University	12	All
Core Team				
Geologist	Ben Sprouse	BS Geology University of South Carolina	6	All-With emphasis in Minerals and Geology
Wilderness Coordinator	John Wesley Sering	BA Geography California State University at Long Beach MS Geography/Wilderness Management University of Idaho	8	All-With emphasis in Wilderness Resources
Writer/Editor	Chet Wheeless	BS Fisheries Biology New Mexico State University MS Environmental Studies University of Montana	3	All
Office Manager	Mary Ann Howell	University of Washington	32	Clerical
Typist	Sandra Thompson	Slippery Rock State College	6	Clerical
Identification Team				
Realty Specialist	Phil Bailey	BS Forestry Oklahoma State University	6	Land/Acres

LIST OF PREPARERS
(Continued)

Title	Name	Degree and School	Experience (Years)	Sections for Which Responsible
Forester	Joe Vessels	BS Forestry Management Colorado State University	4	Forestry
Range Conservationist	Ed Singleton	BS Range Management New Mexico State University	6	Livestock Grazing/Vegetation
Wildlife Biologist	Mike Blymyer	BS Conservation and Resource Development University of Maryland MS Wildlife Management Virginia Polytechnic Institute and State University	8	Terrestrial Wildlife
Fisheries Biologist	Jeff Cameron	BA Biological Sceience California State University at Sacramento Some Graduate School in Fisheries/Entomology	4	Aquatic Wildlife
Recreation Planner	Larry McMasters	BS Park Administration Texas Technical University	3	Recreation
Recreation Planner	Chip Marlow	BS Forest Recreation/Park Management Southern Illinois University MS Forest Recreation/Park Management Southern Illinois University	9	Recreation
Landscape Architect	Francisco Mendoza	BS Landscape Architecture University of Arizona	4	Visual Resources

LIST OF PREPARERS
(Continued)

Title	Name	Degree and School	Experience (Years)	Sections for Which Responsible
Archeologist	Douglas Scott	BS Anthropology University of Colorado PhD Anthropology University of Colorado	5	Cultural Resources
Soil Scientist	William Ypsilantis	BS Forest Management Michigan Technological University MS Forest/Soils University of Idaho	8	Soils
Hydrologist	Dennis Murphy	BS Forest/Watershed Utah State University Some Graduate Work in Hydrology	3	Water Resources
Sociologist	Barbara Schmalz	BS Histroy/Sociology/German Dickinson State College MA Sociology University of Colorado	7	Sociology
Economist	John Martin	BS Agricultural Business Management California Polytechnic State University MS Agricultural Economics University of Nevada	6	Economics
Environmental Coordinator	Bruce Flinn	BS Forest Recreation Colorado State University	8	Wilderness Study Team Leader/Air Quality

LIST OF PREPARERS
(Continued)

Title	Name	Degree and School	Experience (Years)	Sections for Which Responsible
Economist	Charles Romaniello	BA Anthropology University of Arizona MS Agricultural Economics University of Arizona	2	Economist
Recreation Planner	Arden Anderson	BS Wildlife management California State University at Humbolt	10	Recreation/Wilderness
Geologist/Hydrologist	Marcia Sneed	BS Geology Auburn University	6	Minerals

ADIT. A horizontal entrance to an underground mine, as opposed to a shaft, which is vertical.

ALUNITE. A mineral, hydrous potassium aluminum sulfate.

ANIMAL UNIT MONTH (AUM). The amount of forage required to sustain one cow or five sheep for a month.

ANOMALY. A deviation from the norm. A feature considered capable of being associated with commercially valuable mineral deposits.

BASE METALS. Ore metals inferior in value to gold and silver; commonly lead, zinc, copper.

CALDERA. A large volcanic depression, more or less circular in form, the diameter of which is many times greater than that of the included volcanic vent or vents.

CIRQUE. A steep-walled recess in the side of a mountain, caused by glacial erosion.

CONTIGUOUS. Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

DENDRITIC DRAINAGE PATTERN. A pattern of stream drainage characterized by irregular branching in all directions with the tributaries joining the main stream at all angles.

HYDROTHERMAL ALTERATION: Changes in the mineralogical makeup of a body of rock resulting from the interaction of hot magmatic emanations containing abundant water.

OUTSTANDING. 1) Standing out among others of its kind; conspicuous; prominent. 2) Superior to others of its kind, distinguished, excellent.

PRECIOUS METALS. Gold and silver.

PRIMITIVE AND UNCONFINED RECREATION. Nonmotorized and nondeveloped types of outdoor recreational activities.

RECREATION VISITOR DAY (RVD). One individual for 12 hours.

ROAD (ROADLESS). Refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

ROCK GLACIER. A glacierlike mass of angular rock fragments usually heading in cirques or other steep-walled amphitheaters.

SOLITUDE. 1) The state of being alone or remote from habitations, isolation. 2) A lonely, unfrequented, or secluded place.

STANDARD METROPOLITAN STATISTICAL AREA (SMSA). An SMSA is a county which contains at least one city of 50,000 inhabitants or more plus as many adjacent counties as are metropolitan in character and are socially integrated with that central city or cities.

WILDERNESS. The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891). "A wilderness in contrast with those areas where man and his own works dominate the landscape is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean . . . an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological or other features of scientific, educational scenic, or historical value.

WILDERNESS AREA. An area formally designated by Congress as part of the National Wilderness Preservation System.

WILDERNESS STUDY AREA (WSA). A roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964.

REFERENCES

Bauer, C.W. 1979. Initial Showing for the Preference Right Lease Application on Potassium Prospecting Permit C-11418, The Lake City Alunite Deposit, Hinsdale County, Colorado, November 16, 1979.

Boyle, D.R., and Robinson, C.S. 1975. Preliminary Resource Map of San Juan County, Colorado, with text.

Brady, Bruce T. 1975. Map Showing Fluorspar Deposits in Colorado, U.S. Geological Survey Mineral Investigations Resources Map, Map MR-70.

Buelor, William M. 1974. Roof of the Rockies. Boulder, Colorado: Pruett Publishing Company.

Dustin, C.B. Economic Geology and Exploration Strategy. Gavin Pipe Prospect, unpublished and undated.

Federal Emergency Management Agency, Stockpile Report to the Congress, October 1979-March 1980, submitted July 31, 1980.

Johnson, Steven A. 1980. Preliminary Results Mineral Resource Inventory, BLM Mineral Report, April 2, 1980.

Hernbrode K.; Riffel H.; Gardner C. 1980. Colorado Big Game Harvest, Wildlife Services Section, Division of Wildlife.

Lipman, Peter W. 1976. Geologic Map of the Lake City Caldera Area, Western San Juan Mountains, Southwestern Colorado, U.S. Geological Survey, Miscellaneous Investigations Series, Map I-962.

Lipman, P.W., et al. 1976. Multiple Ages of Mid-Tertiary Mineralization and Alternation in the Western San Juan Mountains, Colorado. Bulletin of the Society of Economic Geologists, Vol. 7, No. 3, May, 1976, pp. 571-588.

Lucas, Robert C.; Schreuder, Hans T.; James, George A. 1971. Wilderness Use Estimation: A Pilot Test of Sampling Procedures on the Mission Mountains Primitive Area. Intermountain Forest and Range Experiment Station, Missoula, Montana.

Lucas, Robert C. 1975. Low Compliance Rates at Unnammed Trail Registers. Intermountain Forest and Range Experimont Station, Ogden Utah, August.

Mehnert, H.H.; Slack, J.F.; Cebula, G.T. 1979. K-Ar Age of Alunite Alteration at Red Mountain, Lake City Area, Western San Juan Mountains, Colorado, U.S. Geological Survey Open-File Report 79-1642.

Moore, S., and Schumacher, K. 1980. Recreation economics and the Glenwood Springs Resource Management Plan, Grand Junction District Office, BLM, Department of the Interior.

Nelon; Moore, J.F.; Collins, D.B.; Hornbaker, A.L. 1978. Radioactive Mineral Occurrences of Colorado, Colorado Geological Survey, Bulletin 40.

Pierson, C.T.; Weeks, W.F.; Kleinhampl, F.J. 1958. Reconnaissance for Radioactivity in the Metal-Mining Districts of the San Juan Mountains, Colorado, U.S. Geological Survey Bulletin 1046-O.

Slack, John F. 1980. Multistage Vein Ores of the Lake City District, Western San Juan Mountains, Colorado, Bulletin of the Society of Economic Geologists, Vol. 75, No. 7, November 1980, pp. 963-991.

Steven, T.A.; Lipman, P.W.; Fisher, F.S.; et al. 1977. Mineral Resources of Study Areas Contiguous to the Uncompahgre Primitive Area, San Juan Mountains, Southwestern Colorado, U.S. Geological Survey, Bulletin 1391-E.

Steven, T.A., et al. 1974. Geologic Map of the Durango Quadrangel, Southwestern Colorado, U.S. Geological Survey Miscellaneous Investigations Series, Map I-764.

United States Department of the Interior, Bureau of Land Management, 1977. Alunite - Final Environmental Impact Statement, USDOI.

U.S. Geological Survey 1977. Energy Resources Map of Colorado, Miscellaneous Investigations Servies, Map I-1039.

Vanderbusche, Duane, and Smith, Duane 1981. A Land Alone: Colorado's Western Slope. Boulder, Colorado: Pruett Publishing Company.

Varnes, David J. 1963. Geology and Ore Deposits of the South Silverton Mining Area, San Juan County Colorado, U.S. Geological Survey Professional Paper 378-A.

Welland, E.F., et al. 1980. Geochemical and Geostatistical Evaluation, American Flats-Silverton Planning Units, San Juan Volcanic Province, Colorado, U.S. Geological Survey Open-File Report OF-599.

APPENDIX 1.1

WILDERNESS STUDY POLICY AND PLANNING CRITERIA

The primary goal of the BLM wilderness study process is to recommend for wilderness designation those areas for which it was been determined, through the Bureau's multiple resource planning process and public involvement, that wilderness is the most appropriate alternative use of the land and its resources. The planning criteria which follow will be used in making the analysis on which that determination will be based. These criteria will be applied to BLM wilderness study areas through the BLM planning process, and each criterion will be fully considered and documented in determining whether a WSA is more suitable for wilderness or for other uses.

All BLM wilderness recommendations--both "suitable for preservation as wilderness" and "nonsuitable"--will be justified on the basis of the following criteria.

1. Requirements for Areas Recommended as Suitable for Wilderness Designation.

Areas recommended by the BLM as suitable for wilderness designation must, at a minimum, satisfy both of the following factors:

a. Benefits: The area's identified wilderness values, together with the full range of public benefits which designation would provide to multiple resource values and uses over time must be sufficient to offset the benefits of other resource values and uses which could be foregone due to wilderness designation; and

b. Manageability: The area must be capable fo being effectively managed to preserve its wilderness character in perpetuity.

2. Public Comment.

In determining whether an area is suitable or nonsuitable for wilderness designation, the BLM wilderness study process will consider comments received from interested and affected publics at all levels--local, State, regional and national--with special consideration given to the involvement of those local peoples and institutions that would be most directly affected by the area's designation. Wilderness recommendations will not be based on a vote-counting majority rule system. The BLM will develop its recommendations by considering public comment in conjunction with a full analysis of a wilderness study area's multiple resource and socio-economic values and uses.

3. Local and Regional Socio-Economic Effects.

In determining whether an area is suitable or nonsuitable for wilderness designation, the BLM will give special attention to any significant socio-economic effects, as identified through the wilderness study process, which designation of the area would have on local communities or surrounding regions.

4. Energy and Critical Mineral Resource Values.

Recommendations as to an area's suitability or nonsuitability for wilderness designation will also reflect a thorough consideration of any identified or potential energy and critical mineral resource values present in the area which are capable of meeting domestic energy and critical mineral production needs, and the extent to which wilderness management of such areas would be in the public interest.

5. Consistency with Other Plans.

In determining whether an area is suitable or nonsuitable for wilderness designation, the BLM will fully consider and document the extent to which the recommendation is consistent with officially approved and adopted resource-related plans of other Federal agencies, State and local governments, and Indian tribes (and the policies and programs contained in such plans), as required by FLPMA and the BLM planning regulations.

6. Impacts on Other Resources.

Consider the extent to which other resource values or uses of the area would be foregone or adversely affected as a result of wilderness designation.

7. Impacts on Wilderness.

Consider the alternative use of the land under study if the area is not designated as wilderness, and the extent to which the wilderness values of the area would be foregone or adversely affected as a result of this use.

8. Evaluation of Wilderness Values.

Consider the extent to which each of the following components contributes to the overall value of an area for wilderness purposes:

a. Mandatory Wilderness Characteristics: The quality of the area's mandatory wilderness characteristics--size, naturalness, and outstanding opportunities for solitude or primitive recreation.

b. Special Features: The presence or absence, and the quality of the following optional wilderness characteristics--ecological, geological, or other features of scientific, educational scenic, or historical value.

c. Multiple Resource Benefits: The benefits to other multiple resource values and uses which wilderness designation of the area could ensure.

9. Diversity in the National Wilderness Preservation System: Consider the extent to which wilderness designation of the area under study would contribute to expanding the diversity of the National Wilderness Preservation System on (1) a statewide basis, (2) a regional basis, or (3) a national basis, from the standpoint of each of the factors listed below:

a. Expanding the diversity of natural systems and features, as represented by ecosystems and landforms.

b. Expanding the opportunities for solitude or primitive recreation within a day's driving time (five hours) of major population centers.

c. Balancing the geographic distribution of wilderness areas.

The analysis should consider--in separate categories--all Federal and State land designated as wilderness, all areas officially recommended for wilderness, and all other Federal and State lands under wilderness study. (The State lands referred to here are those involved in State government's wilderness programs.)

APPENDIX 2.1

JUL 16 1981

Interagency Cooperative Agreement
between the
San Juan National Forest,
Department of Agriculture
and
Montrose District, Bureau of Land Management,
Department of the Interior
in the state of Colorado

I. Purpose. The purpose of this agreement between the Bureau of Land Management (BLM) and U.S. Forest Service (FS) is to establish responsibilities, coordinated procedures, and schedules to facilitate a joint wilderness study review of the FS West Needles Further Study Area (15,800 acres) and the BLM West Needles Contiguous Wilderness Study Area (5,780 acres).

II. Authorities.

A. National Environmental Policy Act (42 U.S.C. 4321 et seq.)

B. Wilderness Act of 1964 (16 U.S.C. 1131-1136)

C. National Forest Management Act (16 U.S.C. 1601-1614)

D. Federal Land Policy and Management Act (43 U.S.C. 1701 et. seq)

E. Economy Act (31 U.S.C. 686, 686b)

F. E.O. 11514

G. 40 CFR 1500-1508

H. 36 CFR 219, Subpart A

III. Guidelines and Procedures. Overall guidance and procedures of joint wilderness study shall be followed to the maximum practicable extent as defined in the national level FS-BLM agreement on joint wilderness studies (FSM 150 and WO-163).

Lead Agency. The FS is the lead agency and will provide principal leadership and oversight in ensuring that a joint study plan is developed, carried out, and reported.

The FS will include the BLM Wilderness Study Areas contiguous to the West Needles Further Study Area in its Forest Land and Resource Management Planning Process.

The FS wilderness study approaches will be utilized.

In addition, the FS will oversee the study effort, meeting periodically and upon cooperating agency request to assess progress, identify and resolve operating problems, implement a public participation plan, and oversee preparation and submission of the associated environmental statement and study report.

Cooperating Agency. The BLM is the cooperating agency and will support the FS in planning for and execution of a study, and preparation of attendant reports and recommendations.

The BLM will assist and facilitate joint study efforts and will regularly consult with and, so far as possible, respond to requests of the FS for information and/or assistance. The BLM shall, to the extent possible, share printing, hearing, or other administrative support costs.

The FS and BLM shall submit a joint report and recommendation and will indicate a preferred alternative in the draft study report and DEIS.

Both agencies will maintain field-level contracts, if required, with the Bureau of Mines and Geological Survey with regard to associated mineral survey reports.

In addition, both the FS and BLM will (1) encourage and provide for each other's participation in data gathering efforts and foster common and compatible data collection and correlation for mutual adequacy in meeting respective agency needs; (2) provide for ready access to an exchange of inventory data, maps, etc.; and (3) furnish review copies of environmental statements and study reports.

IV. Other Provisions. Any problems or situations which cannot be reconciled at the Forest Supervisor-District Manager level shall promptly be referred through channels to higher authority for resolution. Nothing in this agreement is to be construed as obligating either agency to expend funds or manpower resources in excess of that authorized by law or allocated administratively to the Forest Supervisor and District Manager for study work.

V. Effective Date. This agreement will become effective on the date of the last signature. Either party, the Forest Supervisor, Forest Service or District Manager, Bureau of Land Management, may terminate this agreement by providing 60 days written notice. Unless terminated by written notice, this agreement shall remain in force until a final decision is made, either by the Administration, or by an act of Congress. Amendments may be proposed by either party at any time, and will become effective upon joint approval.

E.V. Robert M. Tobin — July 29, 1981

Forest Supervisor, San Juan National Forest — Date

Marilyn V. Jones — July 15, 1981

District Manager, Montrose District — Date

JUL 16 1981

Interagency Cooperative Agreement between the Grand Mesa, Uncompahgre and Gunnison National Forests, Department of Agriculture and Montrose District, Bureau of Land Management, Department of the Interior in the state of Colorado

I. Purpose. The purpose of this agreement between the Bureau of Land Management (BLM) and U.S. Forest Service (FS) is to establish responsibilities, coordinated procedures, and schedules to facilitate a joint wilderness study review of the FS Cannibal Plateau Further Planning Area (31,990 acres) and the BLM Sparling Gulch/Friends Creek Wilderness Study Area (1,840 acres) and Slumgullion Slide Wilderness Study Area (1,640 acres).

II. Authorities.

A. National Environmental Policy Act (42 U.S.C. 4321 et seq.)

B. Wilderness Act of 1964 (16 U.S.C. 1131-1136)

C. National Forest Management Act (16 U.S.C. 1601-1614)

D. Federal Land Policy and Management Act (43 U.S.C. 1701 et. seq)

E. Economy Act (31 U.S.C. 686, 686b)

F. E.O. 11514

G. 40 CFR 1500-1508

H. 36 CFR 219, Subpart A

III. Guidelines and Procedures. Overall guidance and procedures of joint wilderness study shall be followed to the maximum practicable extent as defined in the national level FS-BLM agreement on joint wilderness studies (FSM 1^3_50 and WO-163).

Lead Agency. The FS is the lead agency and will provide principal leadership and oversight in ensuring that a joint study plan is developed, carried out, and reported.

The FS will include the BLM Wilderness Study Areas contiguous to the Cannibal Plateau Further Planning Area in its Forest Land and Resource Management Planning Process.

The FS wilderness study approaches will be utilized.

In addition, the FS will oversee the study effort, meeting periodically and upon cooperating agency request to assess progress, identify and resolve operating problems, implement a public participation plan, and oversee preparation and submission of the associated environmental statement and study report.

Cooperating Agency. The BLM is the cooperating agency and will support the FS in planning for and execution of a study, and preparation of attendant reports and recommendations.

The BLM will assist and facilitate joint study efforts and will regularly consult with and, so far as possible, respond to requests of the FS for information and/or assistance. The BLM shall, to the extent possible, share printing, hearing, or other administrative support costs.

The FS and BLM shall submit a joint report and recommendation and will indicate a preferred alternative in the draft study report and DEIS.

Both agencies will maintain field-level contracts, if required, with the Bureau of Mines and Geological Survey with regard to associated mineral survey reports.

In addition, both the FS and BLM will (1) encourage and provide for each other's participation in data gathering efforts and foster common and compatible data collection and correlation for mutual adequacy in meeting respective agency needs; (2) provide for ready access to an exchange of inventory data, maps, etc.; and (3) furnish review copies of environmental statements and study reports.

IV. Other Provisions. Any problems or situations which cannot be reconciled at the Forest Supervisor-District Manager level shall promptly be referred through channels to higher authority for resolution. Nothing in this agreement is to be construed as obligating either agency to expend funds or manpower resources in excess of that authorized by law or allocated administratively to the Forest Supervisor and District Manager for study work.

V. Effective Date. This agreement will become effective on the date of the last signature. Either party, the Forest Supervisor, Forest Service or District Manager, Bureau of Land Management, may terminate this agreement by providing 60 days written notice. Unless terminated by written notice, this agreement shall remain in force until a final decision is made, either by the Administration, or by an act of Congress. Amendments may be proposed by either party at any time, and will become effective upon joint approval.

For _____ July 22, 1981
Forest Supervisor, Grand Mesa, Uncompahgre and Gunnison National Forests — Date

_____ July 15, 1981
District Manager, Montrose District — Date

APPENDIX 2.3

Interagency Cooperative Agreement
between the
San Juan National Forest,
Department of Agriculture
and
Montrose District, Bureau of Land Management,
Department of the Interior
in the State of Colorado

IA-2-81-13-0001

I. Purpose. The purpose of this agreement between the Bureau of Land Management (BLM) and U.S. Forest Service (FS) is to establish responsibilities, coordinated procedures, and schedules to facilitate a joint wilderness study review of the Weminuche Contiguous (1,840 acres), Whitehead Gulch (5,640 acres), and Needle Creek (4,200 acres), BLM Wilderness Study Areas which are contiguous to the FS Weminuche Wilderness Area (463,429 acres).

II. Authorities.

A. National Environmental Policy Act (42 U.S.C. 4321 et seq.)

B. Wilderness Act of 1964 (16 U.S.C. 1131-1136)

C. National Forest Management Act (16 U.S.C. 1601-1614)

D. Federal Land Policy and Management Act (43 U.S.C. 1701 et seq.)

E. Economy Act (31 U.S.C. 686, 686b)

F. E.O. 11514

G. 40 CFR 1500-1508

H. 36 CFR 219, Subpart A

III. Guidelines and Procedures. Overall guidance and procedures of joint wilderness study shall parallel, to the maximum practicable extent, the national level FS-BLM agreement on joint wilderness studies (FSM 150 and WO-163).

Lead Agency. The BLM is the lead agency and will provide principal leadership and oversight in ensuring that a joint study plan is developed, carried out, and reported.

The BLM wilderness study approaches will be utilized.

In addition, the BLM will oversee the study effort, meeting periodically and upon cooperating agency request to assess progress, identify and resolve operating problems, implement a public participation plan, and oversee preparation and submission of the associated environmental statement and study report.

Cooperating Agency. The FS is the cooperating agency and will support the BLM in planning for and execution of a study, and preparation of attendant reports and recommendations.

The FS will assist and facilitate joint study efforts and will regularly consult with and, so far as possible, respond to requests of the BLM for information and/or assistance. The FS shall, to the extent possible, share printing, hearing, or other administrative support costs.

The FS and BLM shall submit a joint report and recommendation and will indicate a preferred alternative in the draft study report and DEIS.

Both agencies will maintain field-level contracts, if required, with the Bureau of Mines and Geological Survey with regard to associated mineral survey reports.

In addition, both the FS and BLM will (1) encourage and provide for each other's participation in data gathering efforts and foster common and compatible data collection and correlation for mutual adequacy in meeting respective agency needs; (2) provide for ready access to an exchange of inventory data, maps, etc.; and (3) furnish review copies of environmental statements and study reports.

IV. Other Provisions. Any problems or situations which cannot be reconciled at the Forest Supervisor-District Manager level shall promptly be referred through channels to higher authority for resolution. Nothing in this agreement is to be construed as obligating either agency to expend funds or manpower resources in excess of that authorized by law or allocated administratively to the Forest Supervisor and District Manager for study work.

In the event that these BLM Wilderness Study Area lands, or portion therein, are transferred to the FS by act of Congress, these lands shall continue to be studied by the FS for their wilderness suitability. In addition, the FS would become the "lead agency" and BLM would become the "cooperating agency" as defined in this cooperative agreement.

V. Effective Date. This agreement will become effective on the date of the last signature. This agreement shall remain in force until a final decision is made, either by the Administration, or by an act of Congress.

Forest Supervisor, San Juan National Forest — Date: 9/3/81

District Manager, Montrose District — Date: August 25, 1981

APPENDIX 3.1

There are presently 12 designated wilderness areas found within this region.

Wilderness Area	Acreage	Managing Agency
Big Blue	97,350	USFS
Black Canyon of the Gunnison	11,180	NPS
La Garita	101,286	USFS
Lizard Head	41,158	USFS
Mesa Verde	8,000	NPS
Mount Sneffels	16,200	USFS
Raggads	58,950	USFS
Weminuche	461,459	USFS/BLM
West Elks	176,092	USFS

In addition, a portion of three designated wilderness areas overlap into the Southwest Colorado region:

Wilderness Area	Acreage	Managing Agency
Collegiate Peaks	159,900	USFS
Maroon Bells/Snowmass	172,560	USFS
South San Juans	127,721	USFS

APPENDIX 3.2

An addition 19 areas within this region are undergoing study for possible recommendation to Congress for wilderness designation:

Study Area	Acreage	Managing Agency
Adobe Badlands	10,560	BLM
Cahone Canyon	8,385	BLM
Camel Back	10,900	BLM
Cannibal Plateau	31,990	USFS
Cross Canyon	9,440	BLM
Dolores River Canyon	25,550	BLM
Dominguez Canyon	75,800	BLM
Fossil Ridge	54,700	USFS
Gunnison Gorge	20,240	BLM
McKenna Peak	21,900	BLM
Menefee Mountain	7,360	BLM
Oh-Be-Joyful	5,500	USFS
Powderhorn Primitive Area	44,951	BLM
Squaw/Papoose Canyon	11,260	BLM
South San Juan	32,800	USFS
Tabeguache Creek	7,270	BLM
Weber Mountain	6,320	BLM
West Needles	15,800	USFS
Wheeler Geologic Area	14,000	USFS

All of the WSAs within the American Flats/Silverton Planning Unit population centers (Standard Metropolitan Statistical Areas). These SMSAs in Colorado are Denver, Boulder, Colorado Springs, and Pueblo. However, there are already 18 designated wilderness areas and 29 areas undergoing study for possible wilderness designation within a days driving time of these major population center. The following designated wilderness areas are within five hours driving time of major population centers in Colorado:

Wilderness Area	Acreage	Managing Agency
Cache Le Poudre	9,400	USFS
Collegiate Peaks	159,900	USFS
Comanche Peak	67,500	USFS
Eagles Nest	133,688	USFS
Great Sand Dunes	33,450	NPS
Holy Cross	116,060	USFS
Hunter-Frying Pan	74,250	USFS
Indian Peaks	70,374	USFS
La Garita	101,286	USFS
Lost Creek	105,680	USFS
Maroon Bells-Snowmass	172,560	USFS
Mount Evans	73,000	USFS
Mount Massive	26,000	USFS
Mount Zirkel	139,818	USFS
Nesta	9,836	USFS
Never Summer	13,702	USFS
Rawah	73,109	USFS
West Elk	176,092	USFS

APPENDIX 3.3

The following areas are undergoing study and are within a days driving time of major population centers in Colorado.

Name of Area	Acres	Managing Agency
Beaver Creek	26,150	BLM
Black Canyon	2,300	BLM
Browns Canyon	6,614	BLM
Buffalo Peaks	56,900	USFS
Bull Gulch	15,000	BLM
Cannibal Plateau	31,990	USFS
Castle Peak	11,940	BLM
Eagle Mountain	330	BLM
Fossil Ridge	54,700	USFS
Greenhorn Mountain	22,300	USFS
Lower Grape Valley	11,700	BLM
McIntyre Hills	16,800	BLM
Papa Keal	1,020	BLM
Piedra	41,500	USFS
Porphory Mountain	8,000	USFS
Powderhorn Primitive Area	44,951	BLM
Rocky Mountain	239,835	NPS
Saint Louis Peak	12,800	USFS
Sand Castle	1,644	BLM
Sangre de Cristo	221,000	USFS
San Luis Hills	10,240	BLM
Service Creek	39,860	USFS
South Piney Creek	870	BLM
Spanish Peaks	19,600	USFS
Troublesome	8,250	BLM
Upper Grape Canyon	10,200	BLM
Vasquez Peak	12,800	USFS
Williams Fork	74,770	USFS
Zapata Creek	720	BLM

APPENDIX 3.4

Scenic Quality and VRM Objectives for All WSAs

Wilderness Study Area		Number	WSA Area	Scenic Quality A	Scenic Quality B	Management Objectives II
Redcloud Peak	1/	208	38,400	32,256	6,144	38,400
Handies Peak	1/	241	18,1260	15,338	2,922	18,260
American Flats	1/	217	4,700	4,700	0	4,700
Larson Creek	1/	086	880	0	880	880
Bill Hare Gulch	1/	085	350	0	350	350

Note: All areas are in acres.
1/ American Flats MFP Step 1, .47 D, Visual.

TABLE 3.5

Existing Scenic Quality

Landform	WSA Number				
Form	085	086	208	217	241
Cliffs	X	X	X		X
Steep Slopes	X	X	X	X	X
Moderate Slopes	X	X	X	X	X
Flats	X	X	X	X	X
Tallus Slopes			X	X	X
Line					
Rock Outcrops	X	X	X	X	X
Rounded Peaks	X	X	X	X	X
Jagged Peaks			X	X	
Rounded Ridges	X	X	X	X	X
Jagged Ridges			X	X	X
Other					
V-Shape Canyons	X	X	X	X	X
Avalanche Runs			X	X	X
Broad Valleys			X	X	X
Swift Streams	X	X	X		X
Gentle Streams					
Steep Gulches	X	X	X		X
Waterfalls					X
Flat Water Bodies			X	X	X

TABLE 3.6

Quality of Scenery Adjacent to WSAs

Wilderness Study Area	Number	Adjacent Scenic Quality		Adjacent Management Objectives	
		A	B	I	II
Redcloud Peak	208	25.1	11.4	2.8*	33.7
Handies Peak	241	28.2		12.4*	15.8
American Flats	217	14.4		6.8**	7.6
Larson Creek	086	1.6	3.8	1.7**	3.7
Bill Hare Gulch	085	1.5	2.6	1.1**	3.0

Note: The effect of adjacent conditions is measured as the extent of the affected boundaries in miles.

* Adjoining USFS Weminuche Wilderness.
** Adjoining Uncompahgre Primitive Area, Uncompahgre National Forest.

TABLE 3.7

Sensitivity to Visual Modifications in the WSAs

Wilderness Study Area	Number	Viewers Attitude	Viewer Volume	Viewing Distance
Redcloud Peak	208	H	H	F
Handies Peak	241	H	H	F
American Flats	217	H	H	F
Larson Creek	086	H	H	F
Bill Hare Gulch	085	H	H	F

H = High visual sensitivity to change.
M = Moderate sensitivity.
L = Low sensitivity.
F = Foregound 0-1 mile.
M = Middleground 1-5 miles.
B = Background 5-15 miles.
S = Seldom seen areas.

APPENDIX 3.8

Mineral Evaluation System

Favorability

Favorability is the potential of a particular geologic environment to contain quantities of mineral resources. Favorability does not consider the feasibility of extraction, the accessibility, or other factors that might preclude economic development of the resource. The rating is based on factors which are (1) adverse, (2), permissive, (3) suggestive, and (4) highly suggestive of the nature of the geologic framework present within and adjacent to a particular location.

Rating	Definition
1.	The lowest measure of favorability; very few geologic characteristics favorable for the accumulation of a given resource are known to be present.
2.	Low intermediate favorability; some geologic characteristics are present that are favorable for the accumulation of a given resource.
3.	High intermediate favorabiliy; a number of geologic characteristics are present that suggest the occurrence of a given resource.
4.	Highest favorability; many geologic features are present that indicate the occurrence of a given resource.
U.	Unknown favorability; this rating will be applied when there are insufficient facts or certainty of potential about the area.

Evaluation of Mineral Potential

WSA: Redcloud Peak CO-030-208

Gross Acreage: 40,000

Resource	Rating
Oil and Gas	1
Coal	1
Geothermal	U
Uranium	3
Base and Precious Metals	4
Other Minerals	4

Summary: Large areas of hydrothermal alternation, numerous surface exposures of sulfide-bearing quartz veins, stream-sediment analysis, mining claim locations, industry exploration data, and the mining history of the general area indicate an extremely high probability of the existence of ore-grade material throughout this area.

WSA: Handies Peak CO-030-241

Gross Acreage: 18,000

Resource	Rating
Oil and Gas	1
Coal	1
Geothermal	U
Uranium	2
Base and Precious Metals	4
Other Minerals	4

Summary: The geologic structure and host-rock types, as well as geochemical sample analysis and exploration inforamtion from industry along with the mining history and current interest as shown by mining claim location indicate a high probability of the occurrence of metallic mineral deposits of economic significance.

WSA: American Flats CO-030-217

Gross Acreage: 4,700

Resource	Rating
Oil and Gas	1
Coal	1
Geothermal	U
Uranium	3
Base and Precious Metals	4
Other Minerals	3

Summary: The proximity of this area to the historical mining areas of the Eureka Graben and to the caldera structures of the Lake City and Uncompahgre calderas, along with the exposure of sulfide-bearing veins and geochemical sample data indicate a high probability of mineral occurrences, particularly in the southern and eastern portions of the area.

WSA: Bill Hare Gulch CO-030-085

Gross Acreage: 370

Resource	Rating
Oil and Gas	1
Coal	1
Geothermal	U
Uranium	1
Base and Precious Metals	1
Other Minerals	1

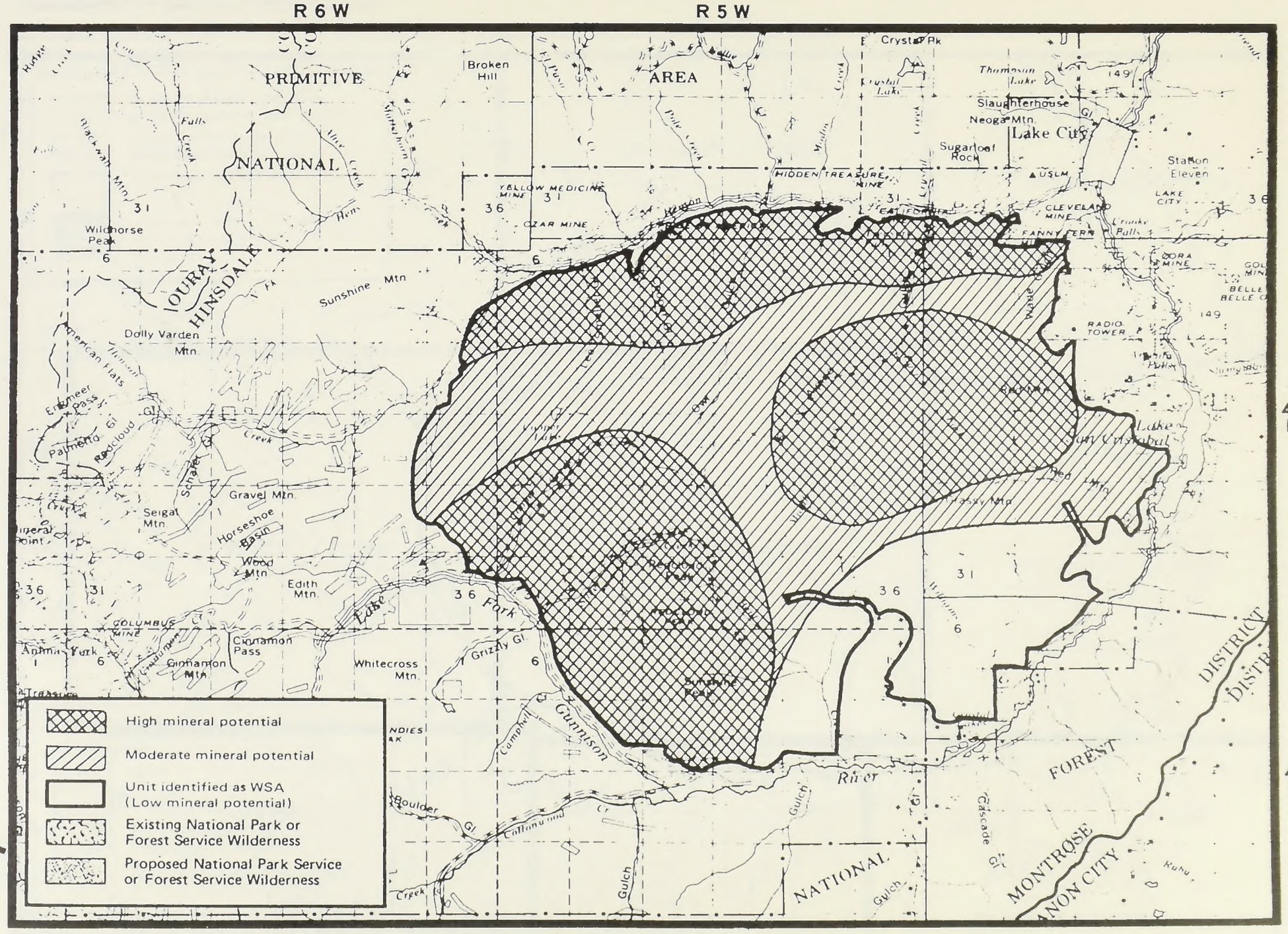
Summary: This area is not within the mineralized zone associated with the Lake City Caldera. Although there are exposures of andesite dikes within this WSA which radiate from the Larson volcanic center, there is no evidence of mineralization associated with them. This area is rated as having low mineral potential.

WSA: Larson Creek CO-030-086

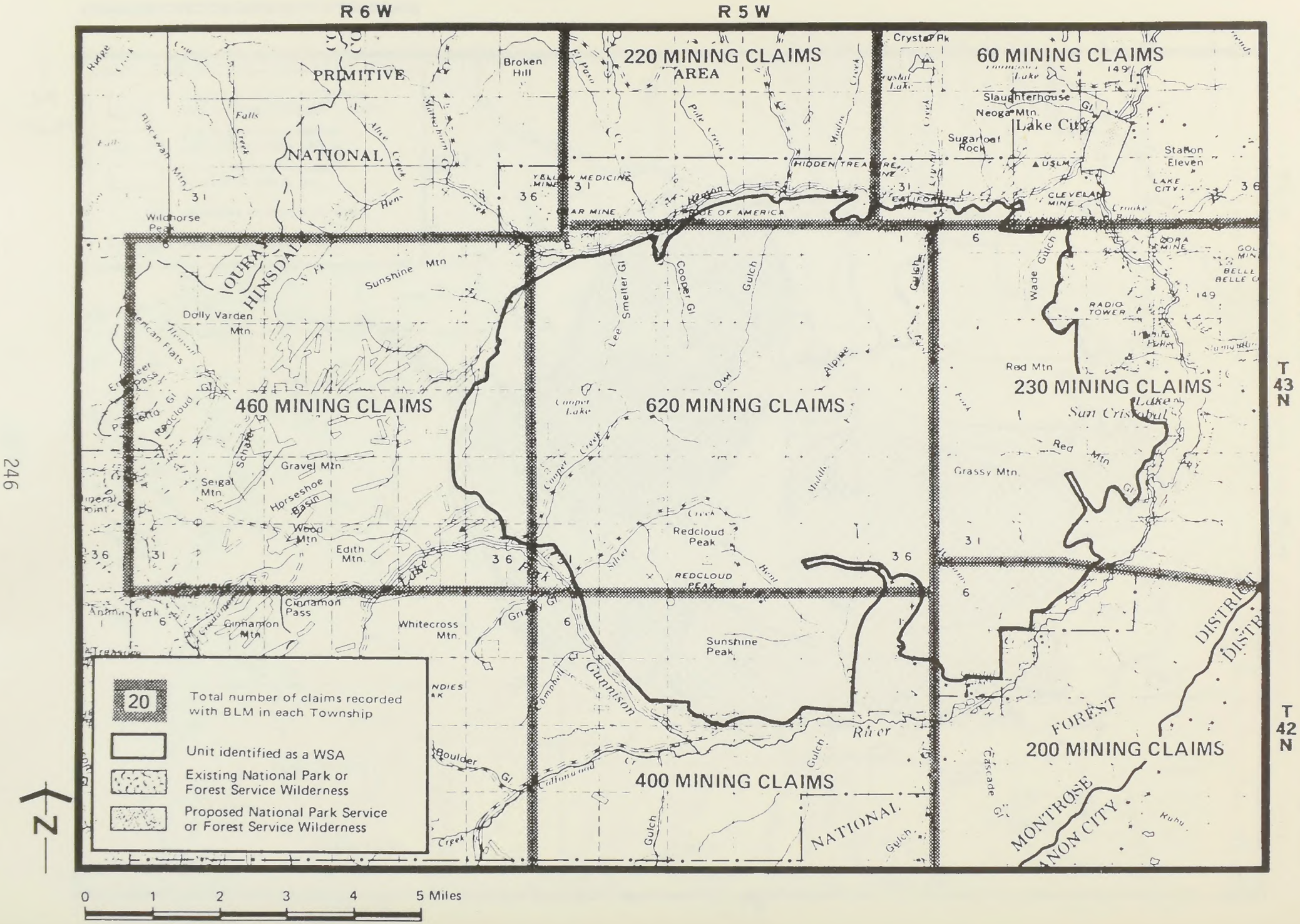
Gross Acreage: 900

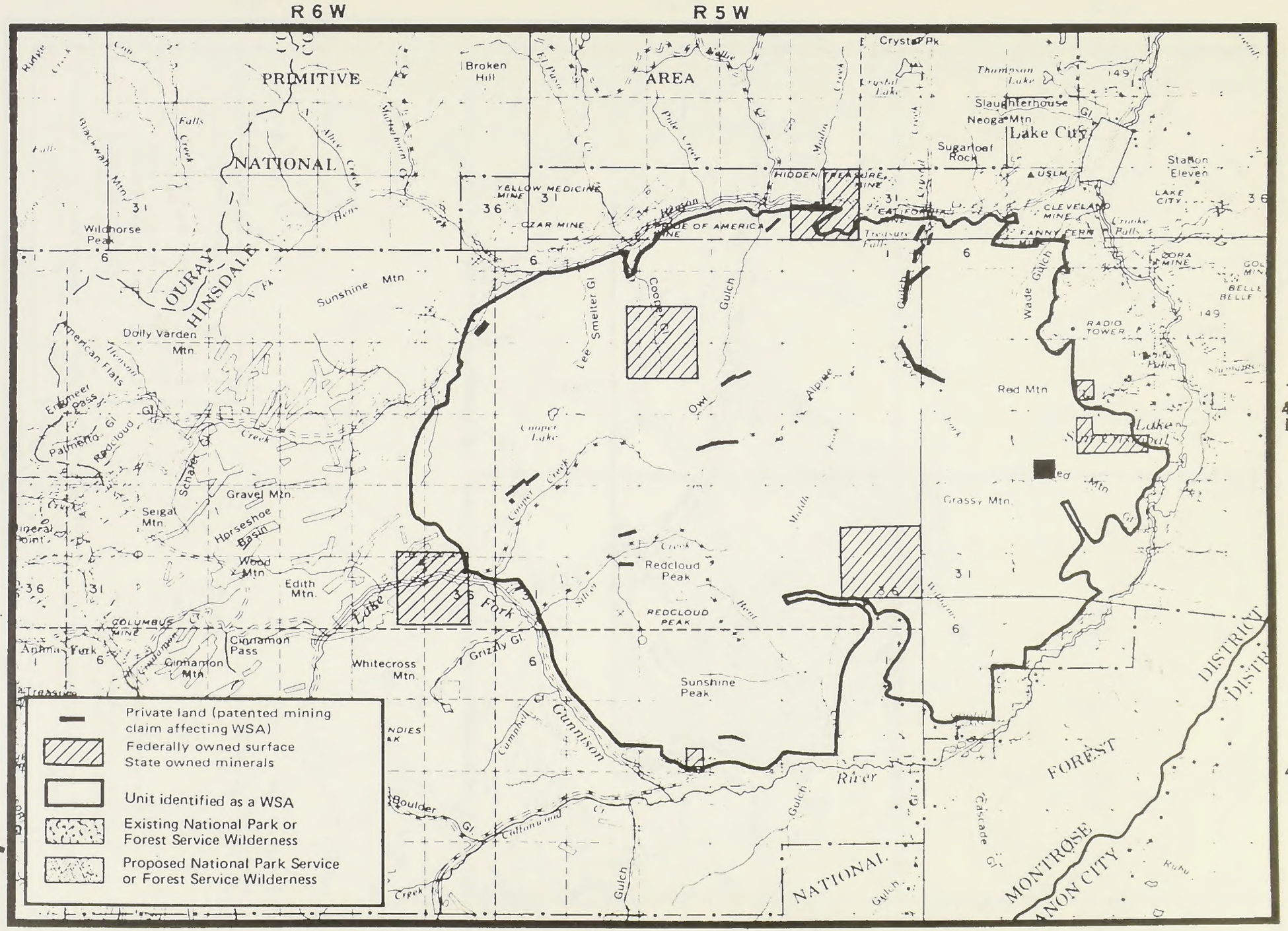
Resource	Rating
Oil and Gas	1
Coal	1
Geothermal	U
Uranium	1
Base and Precious Metals	1
Other Minerals	2

Summary: This area is not included within the mineralized zone associated with the Lake City Caldera. The area contains the Larson volcanic center and associated dikes. There is evidence of prospecting activity on the exposure of one of these dikes, but no mineralization is evident.

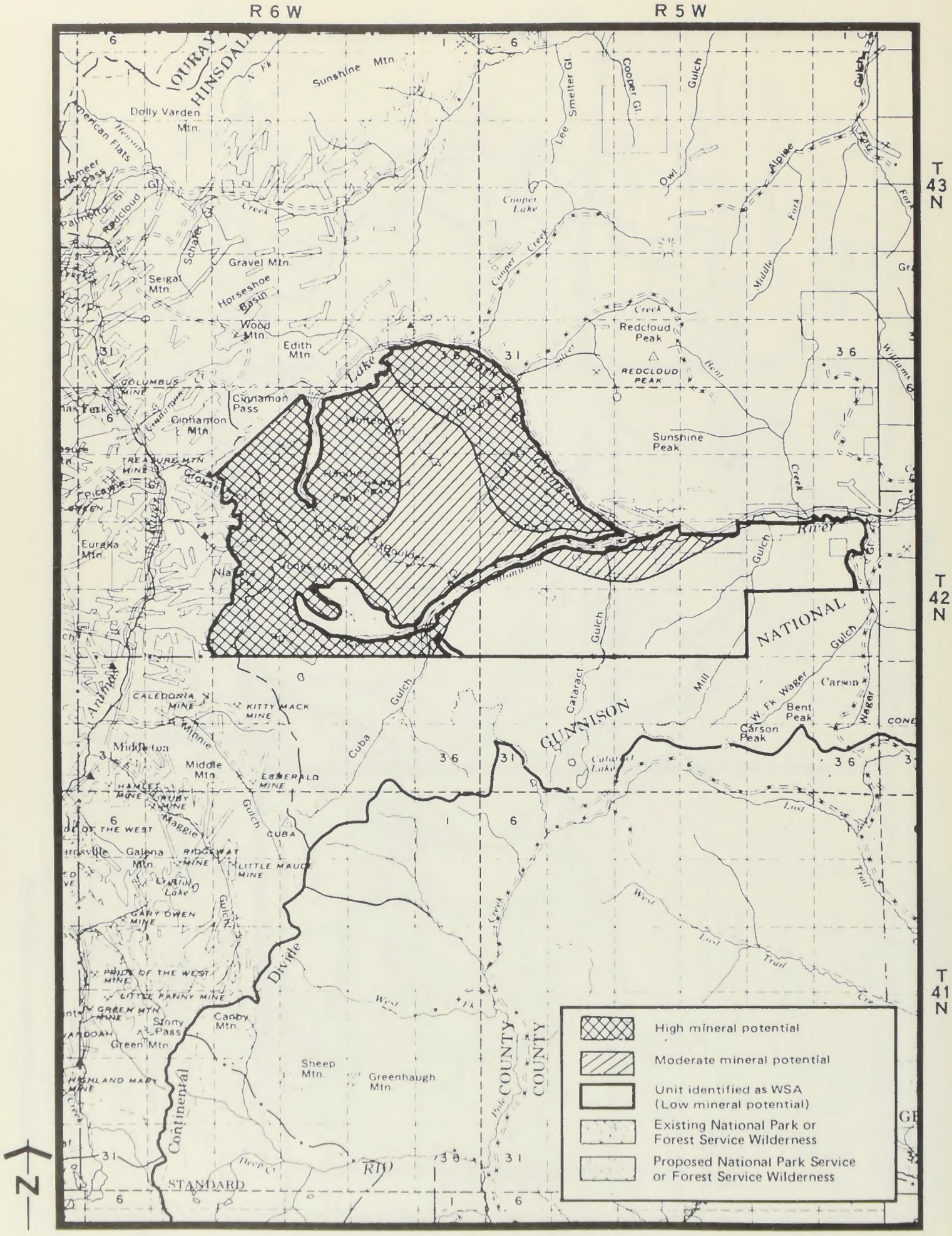


Red Cloud Peak

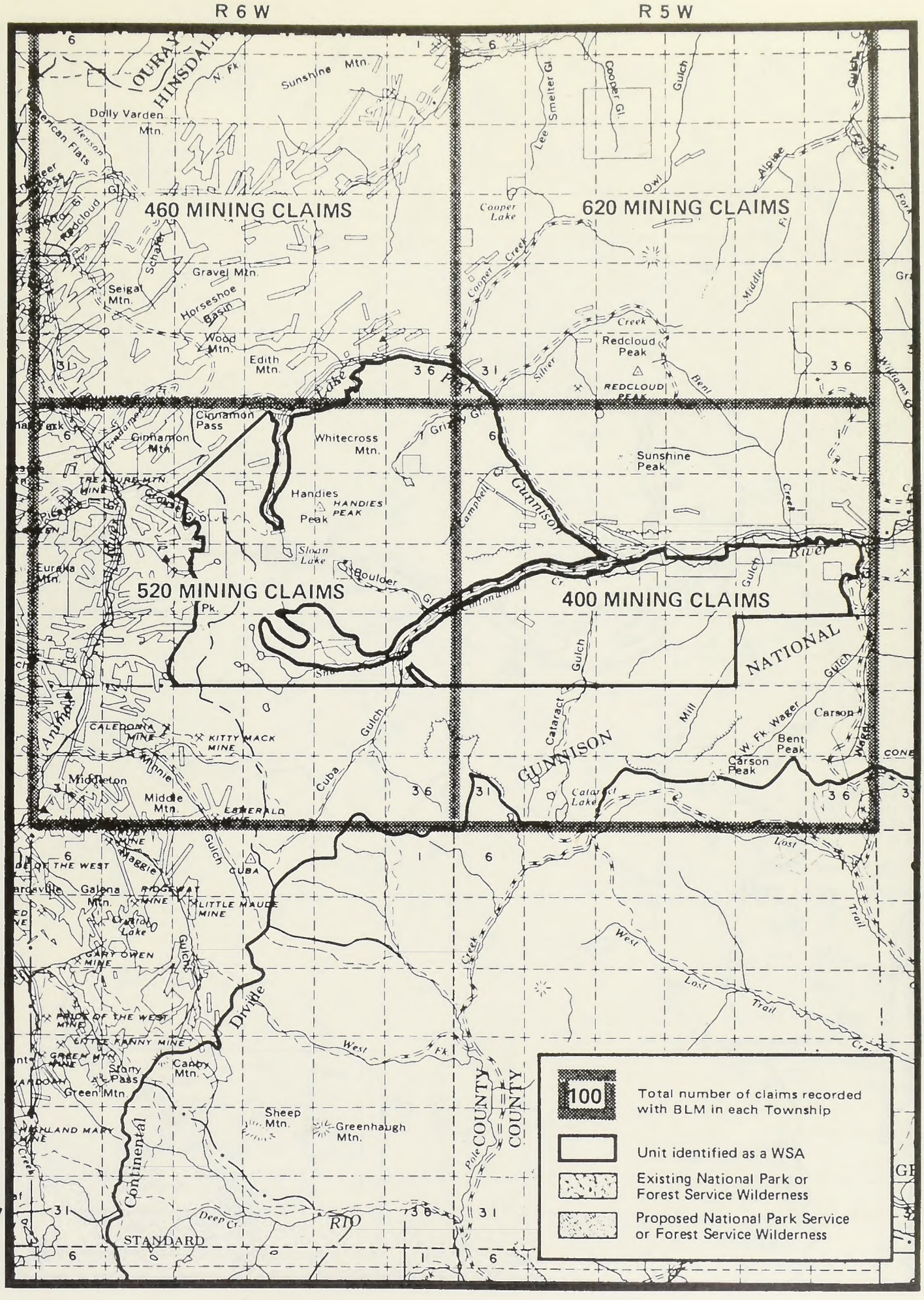

R 6 W
R 5 W
T 43 N
T 42 N
220 MINING CLAIMS AREA
60 MINING CLAIMS
460 MINING CLAIMS
620 MINING CLAIMS
230 MINING CLAIMS
400 MINING CLAIMS
200 MINING CLAIMS
PRIMITIVE
NATIONAL
FOREST
Broken Hill
Wildhorse Pk
Sunshine Mtn
Dolly Varden Mtn
Gravel Mtn
Seigal Mtn
Horseshoe Basin
Wood Mtn
Edith Mtn
Cinnamon Pass
Cinnamon Mtn
Whitecross Mtn
Redcloud Peak
REDCLOUD PEAK
Sunshine Peak
Lake City
Slaughterhouse Gl
Neogar Mtn
Sugarloaf Rock
Station Eleven
Red Mtn
Grassy Mtn
Lake San Cristobal
Gunnison River
MONTROSE
CANON CITY
20
Total number of claims recorded with BLM in each Township
Unit identified as a WSA
Existing National Park or Forest Service Wilderness
Proposed National Park Service or Forest Service Wilderness
N
0 1 2 3 4 5 Miles



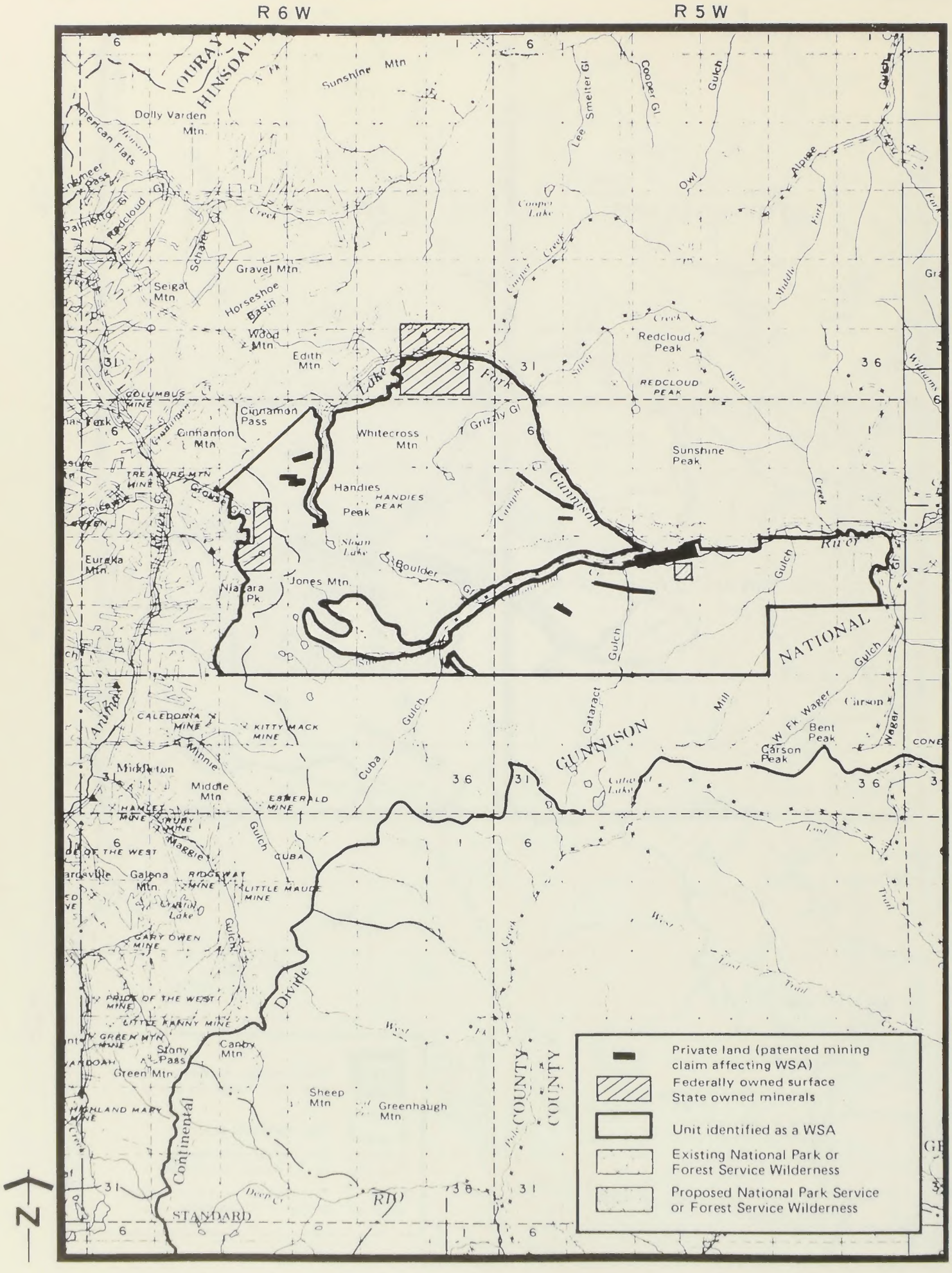
Red Cloud Peak


R 6 W
R 5 W
T 43 N
T 42 N
T 41 N
Sunshine Mtn.
Dolly Varden Mtn.
Gravel Mtn.
Seigal Mtn.
Horseshoe Basin
Wood Mtn.
Edith Mtn.
Cooper Lake
Redcloud Peak
REDCLOUD PEAK
Sunshine Peak
Cinnamon Pass
Cinnamon Mtn.
Handies Peak
Eureka Mtn.
Middleton
Middle Mtn.
Galena Mtn.
Carson Peak
Bent Peak
Carson
Cataract Lake
Sheep Mtn.
Greenhaugh Mtn.
Canby Mtn.
Stony Pass
Green Mtn.
Continental Divide
GUNNISON NATIONAL
COUNTY
COUNTY
STANDARD
High mineral potential
Moderate mineral potential
Unit identified as WSA (Low mineral potential)
Existing National Park or Forest Service Wilderness
Proposed National Park Service or Forest Service Wilderness
N
0 1 2 3 4 5 Miles

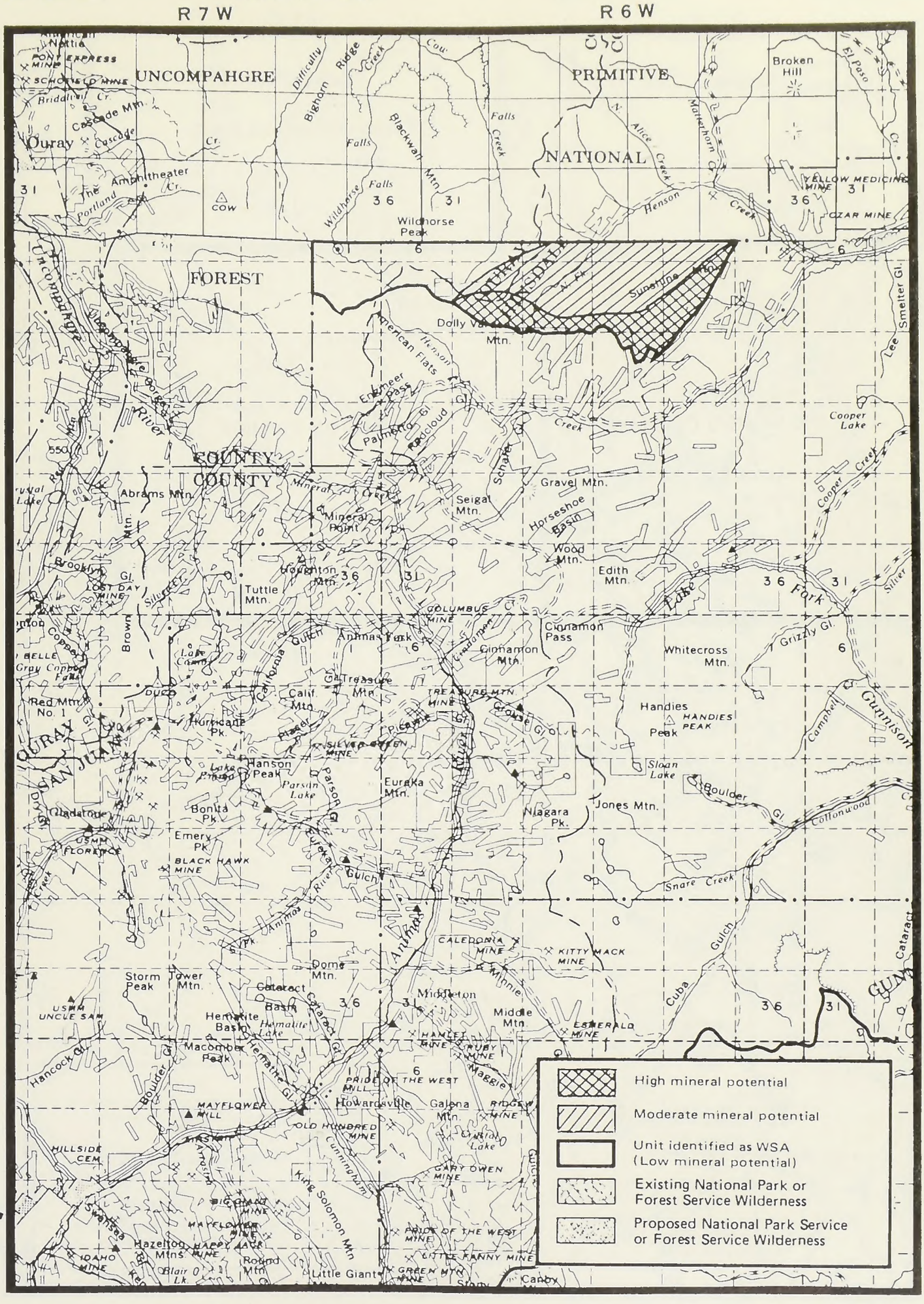
CO-030-241 Handies Peak

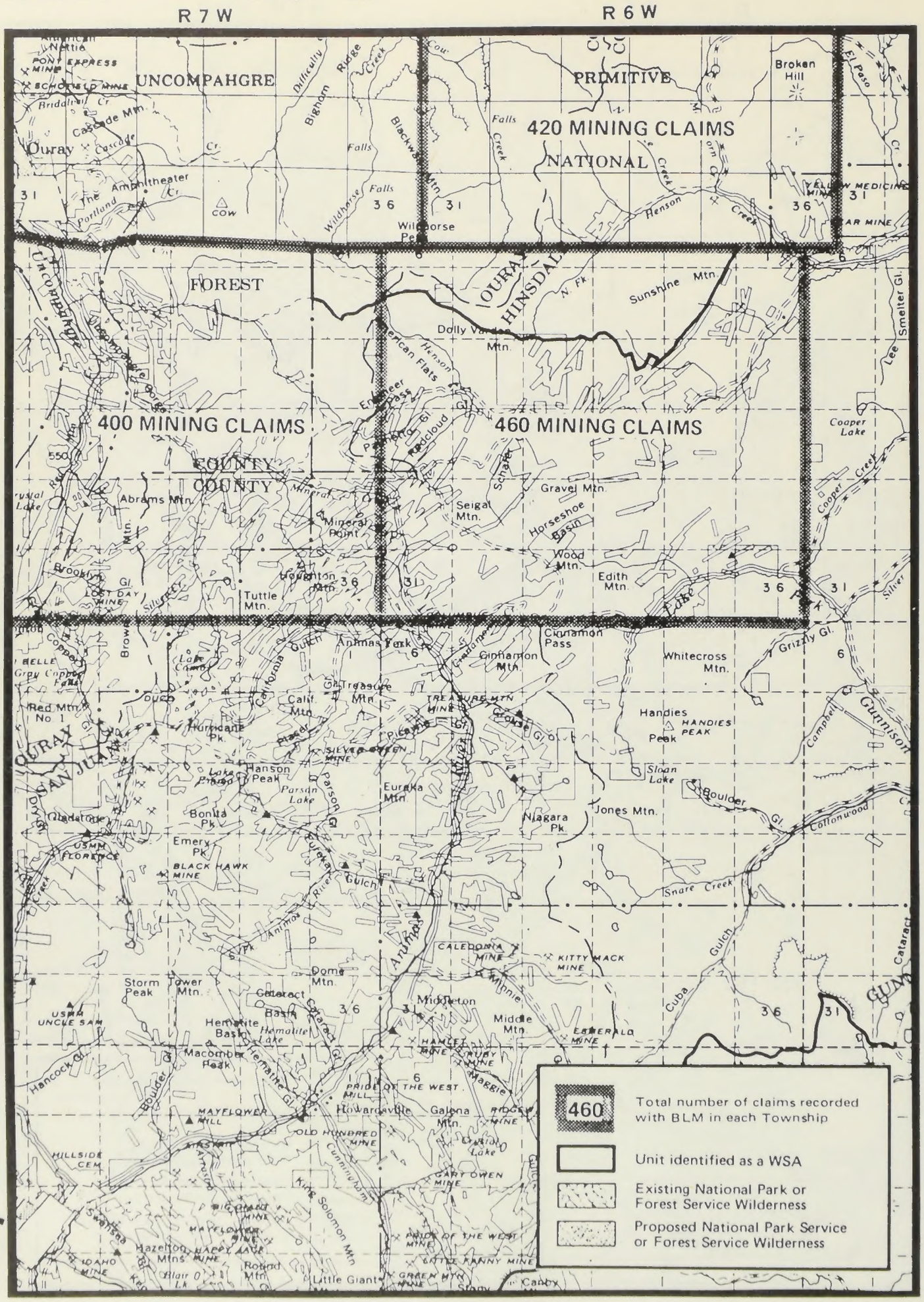


CO-030-241 Handies Peak

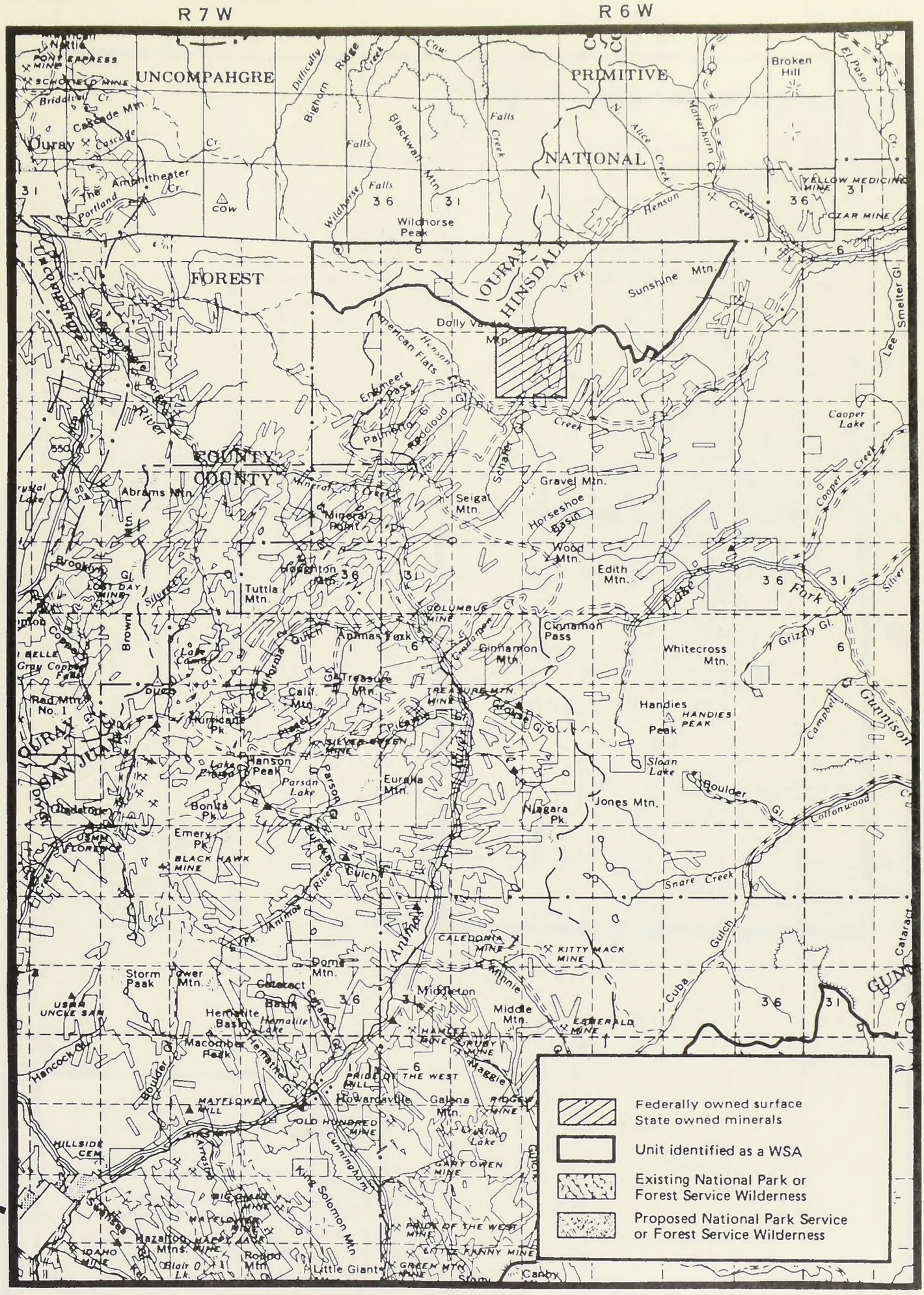


American Flats

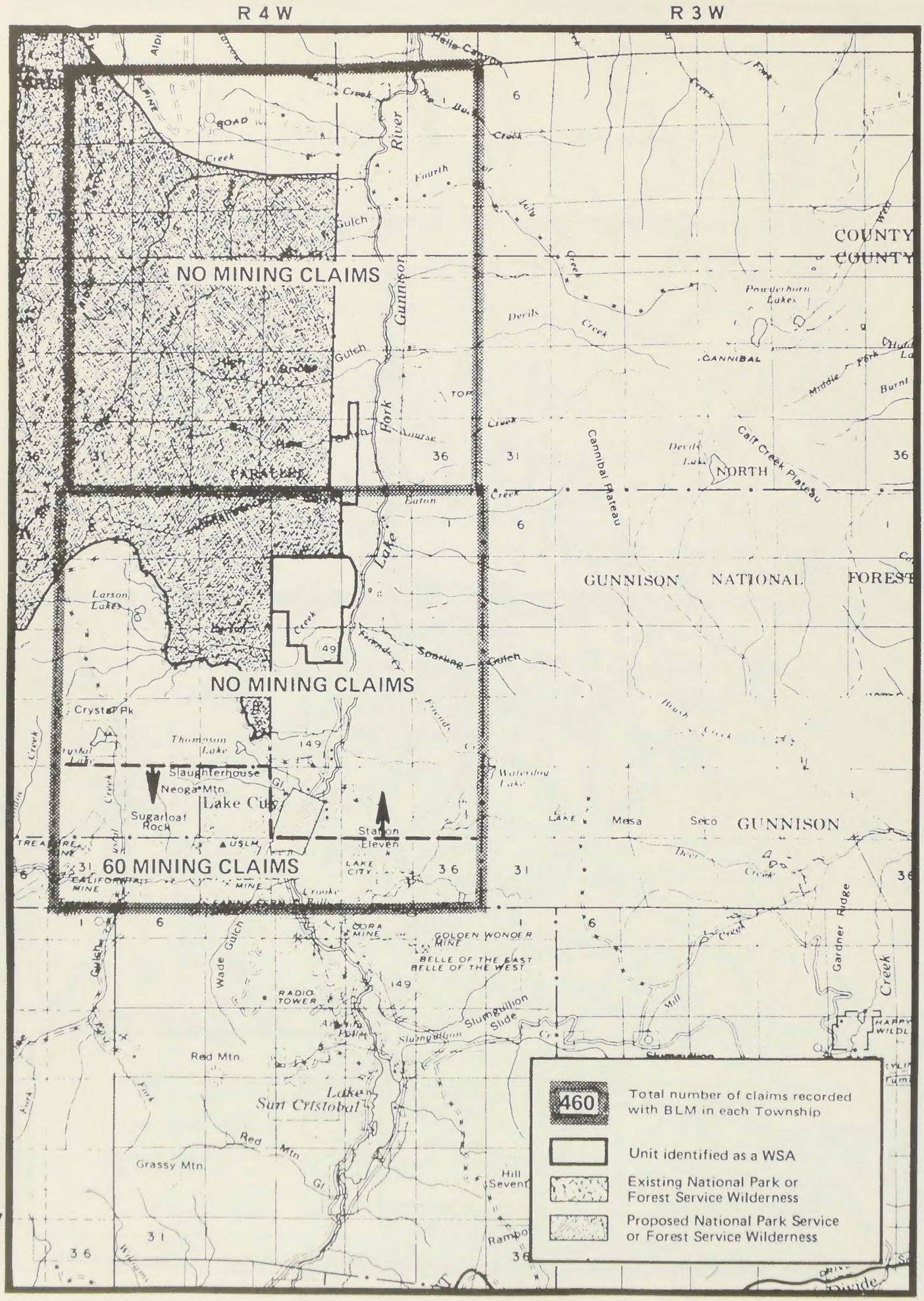

R 7 W
R 6 W
T 43 N
T 42 N
UNCOMPAHGRE
PRIMITIVE
NATIONAL
FOREST
Ouray
Broken Hill
Wildhorse Peak
Dolly Varden Mtn.
Gravel Mtn.
Seigal Mtn.
Wood Mtn.
Edith Mtn.
Abrams Mtn.
Tuttle Mtn.
Houghton Mtn.
Mineral Point
Cinnamon Mtn.
Cinnamon Pass
Whitecross Mtn.
Handies Peak
Sloan Lake
Jones Mtn.
Niagara Pk.
Eureka Mtn.
Hanson Peak
Bonita Pk.
Emery Pk.
Hurricane Pk.
Red Mtn. No. 1
Calif. Mtn.
Treasure Mtn.
Storm Peak
Tower Mtn.
Dome Mtn.
Middleton
Middle Mtn.
Macomber Peak
Howardsville
Galena Mtn.
Hazelton Mtns.
Round Mtn.
Little Giant
Canby
Cooper Lake
Lake Como
Blair Lk
Engineer Pass
Cinnamon Pass
Animas Fork
Mineral Creek
Henson Creek
Cataract Basin
Hematite Basin
Hematite Lake
Parson Lake
Lake Pinard
Sloan Lake
Boulder Gl.
Grizzly Gl.
Snare Creek
Cuba Gulch
Cataract Gulch
Animas River
Uncompahgre River
Lake Fork
Gunnison
Smelter Gl.
Horseshoe Basin
Schafer Creek
Cooper Creek
Silver Creek
Brown Copper
Gray Copper
Red Mtn. No. 1
Treasure Mtn. Mine
Columbus Mine
Silver Queen Mine
Black Hawk Mine
Caledonia Mine
Kitty Mack Mine
Esmerald Mine
Ruby Mine
Hamlet Mine
Pride of the West Mill
Pride of the West Mine
Maggie Mine
Ridge Mine
Old Hundred Mine
Cart Owen Mine
Big Chief Mine
Mayflower Mine
Happy Jack Mine
Idaho Mine
Little Fanny Mine
Green Mtn. Mine
Yellow Medicine Mine
Czar Mine
Lost Day Mine
Belle Mine
USMM Florence
USMM Uncle Sam
Mayflower Mill
Hillside Cem.
Ouray San Juan
Difficulty Ridge
Bighorn Creek
Blackwater Mtn.
Wildhorse Falls
Falls Creek
Alice Creek
Matterhorn Creek
Henson Creek
Superline Mtn.
Palmetto Gl.
Cloudburst Gl.
Hancock Gl.
Hematite Gl.
Maggie Gl.
Cunningham Gulch
King Solomon Mtn.
Canyon Creek
Portland Cr.
Cascade Cr.
Amphitheater Cr.
Briddell Cr.
Cascade Mtn.
Fort Express Mine
Schonsed Mine
Cow
Ouray
Amphitheater
Portland
Cascade
Briddell
Cascade Mtn.
Difficulty
Bighorn
Ridge
Creek
Falls
Blackwater Mtn.
Wildhorse
Alice
Matterhorn
Henson
Superline
Palmetto
Cloudburst
Engineer
Pass
Schafer
Cooper
Lee
Smelter
Gl.
Brooklyn
Silver
Brown
Copper
Gray
Belle
Red Mtn.
No. 1
Hurricane
Pk.
Calif.
Mtn.
Treasure
Mtn.
Columbus
Ct.
Grizzly
Gl.
Whitecross
Mtn.
Handies
Peak
Handies
Peak
Sloan
Lake
Boulder
Gl.
Jones
Mtn.
Niagara
Pk.
Collomwood
Snare
Creek
Cuba
Gulch
Cataract
Gulch
Gunnison
Lake
Fork
Cooper
Lake
Como
Lake
Pinard
Hanson
Peak
Parson
Lake
Eureka
Mtn.
Bonita
Pk.
Emery
Pk.
Storm
Peak
Tower
Mtn.
Dome
Mtn.
Middleton
Middle
Mtn.
Macomber
Peak
Howardsville
Galena
Mtn.
Hazelton
Mtns.
Round
Mtn.
Little
Giant
Canby
Blair
Lk
Engineer
Pass
Cinnamon
Pass
Animas
Fork
Mineral
Creek
Henson
Creek
Cataract
Basin
Hematite
Basin
Hematite
Lake
Parson
Lake
Lake
Pinard
Sloan
Lake
Boulder
Gl.
Grizzly
Gl.
Snare
Creek
Cuba
Gulch
Cataract
Gulch
Animas
River
Uncompahgre
River
Lake
Fork
Gunnison
Smelter
Gl.
Horseshoe
Basin
Schafer
Creek
Cooper
Creek
Silver
Creek
Brown
Copper
Gray
Copper
Belle
Red
Mtn.
No. 1
Treasure
Mtn.
Mine
Columbus
Mine
Silver
Queen
Mine
Black
Hawk
Mine
Caledonia
Mine
Kitty
Mack
Mine
Esmerald
Mine
Ruby
Mine
Hamlet
Mine
Pride
of the
West
Mill
Pride
of the
West
Mine
Maggie
Mine
Ridge
Mine
Old
Hundred
Mine
Cart
Owen
Mine
Big
Chief
Mine
Mayflower
Mine
Happy
Jack
Mine
Idaho
Mine
Little
Fanny
Mine
Green
Mtn.
Mine
Yellow
Medicine
Mine
Czar
Mine
Lost
Day
Mine
Belle
Mine
USMM
Florence
USMM
Uncle
Sam
Mayflower
Mill
Hillside
Cem.
Ouray
San
Juan
Difficulty
Ridge
Bighorn
Creek
Falls
Creek
Blackwater
Mtn.
Wildhorse
Falls
Alice
Creek
Matterhorn
Creek
Henson
Creek
Superline
Mtn.
Palmetto
Gl.
Cloudburst
Gl.
Hancock
Gl.
Hematite
Gl.
Maggie
Gl.
Cunningham
Gulch
King
Solomon
Mtn.
Canyon
Creek
Portland
Cr.
Cascade
Cr.
Amphitheater
Cr.
Briddell
Cr.
Cascade
Mtn.
Fort
Express
Mine
Schonsed
Mine
Cow
Ouray
Amphitheater
Portland
Cascade
Briddell
Cascade
Mtn.
Difficulty
Bighorn
Ridge
Creek
Falls


R 7 W
R 6 W
UNCOMPAHGRE
PRIMITIVE
420 MINING CLAIMS
NATIONAL
FOREST
400 MINING CLAIMS
460 MINING CLAIMS
COUNTY
COUNTY
T 43 N
T 42 N
Ouray
Broken Hill
Cascade Mtn.
Amphitheater
Dolly Varden Mtn.
Sunshine Mtn.
Engineer Pass
Abrams Mtn.
Mineral Point
Gravel Mtn.
Seigal Mtn.
Horseshoe Basin
Wood Mtn.
Edith Mtn.
Tuttle Mtn.
Houghton Mtn.
Cinnamon Pass
Cinnamon Mtn.
Whitecross Mtn.
Handies Peak
Sloan Lake
Jones Mtn.
Niagara Pk.
Eureka Mtn.
Hanson Peak
Parsan Lake
Bonita Pk.
Emery Pk.
Red Mtn. No 1
Hurricane Pk.
Calif. Mtn.
Treasure Mtn.
Storm Peak
Tower Mtn.
Dome Mtn.
Cataract Basin
Hematite Basin
Macomber Peak
Middleton
Middle Mtn.
Howardsville
Galena Mtn.
Grand Lake
Hazelton Mtns.
Round Mtn.
Little Giant
Stony
Cooper Lake
Lake Como
Lake Emma
Lake Pleasant
Hematite Lake
Animas Forks
Animas River
Uncompahgre River
Henson Creek
Cooper Creek
Snare Creek
Cuba Gulch
Grizzly Gl.
Boulder Gl.
Collonwood
Campbell
Gunnison
Smelter Gl.
Lee
Silver
Brooklyn Gl.
Lost Day Mine
Treasure Mtn. Mine
Sunnyside Mine
Black Hawk Mine
Caledonia Mine
Kitty Mack Mine
Minnie
Pride of the West Mine
Mayflower Mill
Old Hundred Mine
Gary Owen Mine
Little Fanny Mine
Green Mtn.
Yellow Medicine Mine
460
Total number of claims recorded with BLM in each Township
Unit identified as a WSA
Existing National Park or Forest Service Wilderness
Proposed National Park Service or Forest Service Wilderness
0 1 2 3 4 5 Miles

CO-030-217 American Flats



CO-030-085 Bill Hare Gulch
CO-030-086 Larson Creek



APPENDIX 3.9

RECORDED CULTURAL SITES

Site a/	Type	Description	WSA	Location	Land Status	Eligibility b/
AF004	Mill	Log tipple, stone chimney, concrete mill foundation. CA. 1890-1910	American Flats	Outside WSA boundary on Henson Creek	Patented Mining Claim	Probably Not
AF018	Cabin	Collapsed log cabins CA. 1900	Redcloud Peak	Outside WSA boundary in Burrows Park	Patented Mining Calim	Probably Not
AF019	Mine	Adit, tipple, three wood structures	Redcloud Peak	In WSA in Burrows Park	BLM	Possible
AF041	Dam	Collapsed concrete dam	Redcloud Peak	In WSA on Henson Creek	BLM	Possible
H-B-016	Gothard Mine	Shaft and collapsed shaft house	Redcloud Peak	In WSA near Alpine Gulch	Patented Mining Claim	Probably Not
H-B-017	Cherokee Mine	Adit and four collapsed cabins	Redcloud Peak	In WSA near Alpine Gulch	Patented Mining Claim	Probably Not
H-B-030	Lucky Chance Hydro-electric Plant	Collapsed concrete dam, foundations for electric works, pipeline	American Flats	Partially in WSA, partially on private land on North Fork Henson Creek	Both BLM and Patented Lands	Possible

a/ BLM assigned number
b/ For inclusion in the National Register of Historic Places in accordance with 36 CFR 800.

APPENDIX 4.1

VALUE OF RECREATION

The recreation value for each WSA in the Gunnison Basin EIS is a total of the estimated value of hunting, camping, climbing and backpacking. Final recreation values are rounded to the nearest 100, 1980 dollars and are presented in Appendix 4.4.

The value of camping, climbing and backpacking for each WSA is based upon estimated use figures present in Chapter 3. Appendix 4.2 presents the final tabulation of camping, climbing and backpacking RVD figures for 1980, 1985 and 2000, next to the letter D (day). When presented in the text these figures are rounded to the nearest 10 RVDs.

The value of a RVD for camping, climbing and backpacking is estimated to be $33.00. This value is a derived willingness to pay figure presented by Steve Moore and Kurt Schumacker in their paper "Recreation Economics" and "The Glenwood Springs Resource Management Plan". Moore and Schumacker present the $33.00 figure as strictly a primitive camping figure. In this EIS the assumption is made that climbing and backpacking are also represented by this figure.

Total camping, climbing and backpacking values for each WSA for 1980, 1985 and 2000 are found in Appendix 4.2 next to the letter V (value) and in Appendix 4.4 next to the letter C (camping). These values are simple multiples of recreation use figures (RVDs) and the $33.00 value discussed above.

The derivation of recreation values for hunting is presented in Appendix 4.3. The value of hunting for each WSA is based upon hunting figures for deer, elk, and bear presented in the "1980 Colorado Big Game Harvest" produced by the Department of Natural Resources, Division of Wildlife.

The methods for establishing hunting figures for each WSA begins with the assumption that hunting within a hunting unit is evenly distributed. The area of each WSA is divided by the area of its appropriate hunting unit and then multiplied by the number of hunting days within the hunting unit for deer, elk and black bear. This process yields a hunter day figure D (day) for each WSA for deer, elk and bear.

The hunter day figure is multiplied by a willingness to pay value (WTP) found in Moore and Schumacker. (The WTP figure for bear is assessed to be the same as the figure Moore and Schumacker suggest for elk.) The hunter day figure multiplied by the WTP vlues yields a value of hunting for each WSA for deer, elk and bear.

These figures are totalled and give a value of hunting for 1980 in 1980 dollars. 1985 and 2000 hunting values are established by applying a yearly growth factor.

Total value of recreation is presented in Appendix 4.4. Camping values (C) and hunting values (H) are totalled and rounded to the nearest 100, 1980 dollars to present All Wilderness Values for 1980, 1985 and 2000 for each WSA. Wilderness Management and Conflict Resolution alternatives are derived by multiplying the All-Wilderness values by a percentage figure (P) to yield a value of recreation for each alternative. This figure is rounded to the nearest 100, 1980 dollars and found next to the letter T (total).

Estimates on recreation use was made by the Montrose District Wilderness Resource and Recreation staff.

APPENDIX 4.2

Value of Recreation (Camping, Climbing, Backpacking) 1980 Dollars
Days and Value of Camping, Climbing, Backpacking at $33.00 per RVD 1/
Willingness to Pay

	All-Wilderness					
	1980		1985		2000	
Wilderness Study Area	Days and Value		Days and Value		Days and Value	
Redcloud Peak	D	2,209	D	3,557	D	11,288
	V	72,897	V	117,381	V	372,504
Handies Peak	D	2,557	D	4,117	D	13,066
	V	84,381	V	135,861	V	431,178
American Flats	D	1,977	D	2,906	D	9,213
	V	65,241	V	95,898	V	304,029
Bill Hare Gulch	D	162	D	238	D	755
	V	5,346	V	7,854	V	24,915
Larson Creek	D	162	D	238	D	755
	V	5,346	V	7,854	V	24,915

1/ Recreation Economics and The Glenwood Springs Resource Management Plan, Moore and Schumaker, Appendix 4.4

APPENDIX 4.3

Value of Recreation (Hunting) in 1980 Dollars 1/

WSA	Hunting Unit Area Sq. Mi. 1/	WSA Area Sq. Mi.	Deer Hunter Days Unit 1/	Elk Hunter Days Unit 1/	Black Bear Days Unit 1/	WSA Sq. Mi. Unit Area Sq. Mi.	WSA Deer Hunter Days WTP Value 2/	WSA Elk Hunter Days WTP Value 2/	WSA Bear Hunter Days WTP Value 2/	Value of Hunting 1980	1985 Value of Hunting at 8% Increase Per Year	2000 Value of Hunting at 8% Increase Per Year
Redcloud Peak	U 66 A 914	W 63.4	5,377	12,494	511	.06937	D 373 WTP 46 V 17,158	D 867 WTP 53 V 45,951	D 35 WTP 53 V 1,855	64,964	104,553*	331,953
Handies Peak	U 66 A 914	W 29.5	5,377	12,494	511	.03228	D 174 WTP 46 V 8,004	D 403 WTP 53 V 21,359	D 16 WTP 53 V 848	30,211	48,653*	154,417
American Flats	U 66 A 914	W 7.4	5,377	12,494	511	.00810	D 44 WTP 46 V 2,024	D 101 WTP 53 V 5,353	D 4 WTP 53 V 212	7,589	11,154	35,347
Bill Hare Gulch	U 66 A 914	.6	5,377	12,494	511	.00066	D 4 WTP 46 V 184	D 8 WTP 53 V 424	D 0 WTP 0 V 0	608	912	2,837
Larson Creek	U 66 A 914	1.4	5,377	12,494	511	.00153	D 8 WTP 46 V 368	D 19 WTP 53 V 1,007	D 1 WTP 53 V 53	1,428	2,091	6,630

1/ 1980 Colorado big game harvest

2/ Willingness to pay for recreation unit day (Moore and Schumacker - Appendix 4-4)
Includes a 10 percent per annum growth rate for first five years.

APPENDIX 4-4

Value of Recreation - 1980 Dollars

WSA	All-Wilderness			Wilderness Management			Conflict Resolution 1			Conflict Management II		
	1980	1985	2000	1980	1985	2000	1980	1985	2000	1980	1985	2000
	Hunting Value Plus Camping, Climbing, Backpacking Value=Total Value*			Percent of Wilderness Value and Total Recreation Value								
Redcloud Peak	H 64,964	H 104,553	H 331,953	P 100	P 100	P 100	P 100	P 100	P 100	P 100	P 100	P 100
	C 72,897	C 117,381	C 372,504	T 137,900	T 221,900	T 704,500	T 137,900	T 221,900	T 598,800	T 137,900	T 221,900	T352,200
*	T 137,900	T 221,900	T 704,500									
Handies Peak	H 30,211	H 48,653	H 154,417	P 50	P 50	P 50	P 100	P 100	P 100	-	-	-
	C 84,381	C 135,861	C 431,178	T 57,300	T 92,300	T 292,800	T 114,600	T 184,500	T 292,800	-	-	-
*	T 114,600	T 184,500	T 585,600									
American Flats	H 7,589	H 11,154	H 35,347	P 90	P 90	P 90	-	-	-	-	-	-
	C 65,241	C 95,898	C 304,029	T 65,500	T 96,300	T 305,400	-	-	-	-	-	-
*	T 72,800	T 107,000	T 339,400									
Bill Hare Gulch	H 608	H 912	H 2,837	P 100	P 100	P 100	-	-	-	-	-	-
	C 5,346	C 7,854	C 24,915	T 6,000	T 8,800	T 27,800						
*	T 6,000	T 8,800	T 27,800									
Larson Creek	H 1,428	H 2,091	H 6,630	P 30	P 30	P 30	-	-	-	-	-	-
	C 5,346	C 7,854	C 24,915	T 2,000	T 3,000	T 9,500						
*	T 6,800	T 9,900	T 3,150									

* Total value is rounded to nearest 100.

APPENDIX 4.5

Recreation Opportunities Spectrum

The effects of the various alternatives on the types of recreation opportunities available in all the WSAs, excluding Redcloud Peak, can be summarized as follows:

	Recreation Opportunity Class				
WSA	Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
Handies Peak	-	71%	-	29%	-
American Flats	-	100%	-	-	-
Bill Hare Gulch	-	39%	-	61%	-
Larson Creek	-	74%	-	26%	-

Execept for Redcloud Peak, the remaining WSAs being analyzed in the environmental statement do not provide a real diversity of recreation opportunity classes. Only two opportunity classes are exhibited in each of these WSAs. The American Flats WSA, however, has but one opportunity class.

Therefore, potential wilderness users can achieve only a limited variety of recreation experiences in these WSAs. The various alternatives for the WSAs serve to reduce the amount of acreage that each WSA exhibits in specific opportunity classes. Because of the lack of diversity in the opportunity classes exhibited in the WSA, managers will have an equally limited latitude in exercising different options for managing the wilderness resource and its use.

In summary, Redcloud Peak WSA becomes very significant when recognizing that the remaining WSAs in the study area provide wilderness recreation in just two opportunity classes. The Redcloud Peak WSA is the only WSA in the study area which exhibits the primitive recreation opportunity class; that is, an area in which the potential wilderness user can achieve experiences associated with the most pure forms of wilderness recreation (e.g., challenge, risk-taking, isolation, necessity to utilize outdoor skills with a high degree of interaction with the natural environment).

Redcloud WSA: Total Acres 40,575

Alternatives	Acres in Each Alternative/% of Total WSA	Acres/% of Total WSA in Each Recreation Opportunity Class: Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
A. Designate Entire Area	40,575 ac. 100%	12,984 ac. 32%	22,316 ac. 55%	2,029 ac. 5%	3,246 ac. 8%	-
B. Non-Designation	-	-	-	-	-	-
C. Wilderness Manageability	37,530 ac. 93%	12,010 ac. 30%	20,266 ac. 50%	2,252 ac. 6%	3,002 ac. 7%	-
D. Conflict Resolution Alternative I	30,400 ac. 73%	10,685 ac. 26%	16,747 ac. 40%	1,187 ac. 3%	1,781 ac. 4%	-
E. Conflict Resolution Alternative II	11,140 ac. 28%	3,693 ac. 9%	6,328 ac. 16%	224 ac. 1%	895 ac. 2%	-

Handies Peak WSA: Total Acres 18,860

Alternatives	Acres in Each Alternative/% of Total WSA	Acres/% of Total WSA in Each Recreation Opportunity Class: Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
A. Designate Entire Area	18,860 ac. 100%	-	13,391 ac. 71%	-	5,469 ac. 29%	-
B. Non-Designation	-	-	-	-	-	-
C. Wilderness Manageability	8,220 ac. 44%	-	5,836 ac. 31%	-	2,384 ac. 13%	-
D. Conflict Resolution Alternative I	7,885 ac. 38%	-	5,669 ac. 28%	-	2,216 ac. 10%	-

1/ Although acreage figures have changed between the DEIS and FEIS due to split-estate acreage, the impacts to recreation, under each alternative, remains the same.

APPENDIX 4.5
(Continued)

American Flats WSA: Total Acres 4,710

Alternatives	Acres in Each Alternative/% of Total WSA	Acres/% of Total WSA in Each Recreation Opportunity Class				
		Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
A. Designate Entire Area	4,710 ac. 100%	-	4,710 ac. 100%	-	-	-
B. Non-Designation	-	-	-	-	-	-
C. Wilderness Manageability	-	-	-	-	-	-
D. Conflict Resolution Alternative I	1,505 ac. 32%	-	1,505 ac. 32%	-	-	-

Bill Hare Gulch WSA: Total Acres 370

Alternatives	Acres in Each Alternative/% of Total WSA	Acres/% of Total WSA in Each Recreation Opportunity Class				
		Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
A. Designate Entire Area	370 ac. 100%	-	144 ac. 39%		226 ac. 61%	-
B. Non-Designation	-	-	-	-	-	-
C. Wilderness Manageability	325 ac. 88%	-	263 ac. 71%	-	62ac. 17%	-

Larson Creek WSA: Total Acres 900

Alternatives	Acres in Each Alternative/% of Total WSA	Acres/% of Total WSA in Each Recreation Opportunity Class				
		Primitive	Semi-Primitive Non-Motorized	Semi-Primitive Motorized	Roaded Natural	Rural
A. Designate Entire Area	900 ac. 100%	-	666 ac. 74%	-	234 ac. 26%	-
B. Non-Designation	-	-	-	-	-	-
C. Wilderness Manageability	480 ac. 53%	-	403 ac. 44%	-	77 ac. 9%	-

☆ U.S. GOVERNMENT PRINTING OFFICE: 1987- 773-065/40066

BLM Library
D-553A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047

Form 1279-3
(June 1984)

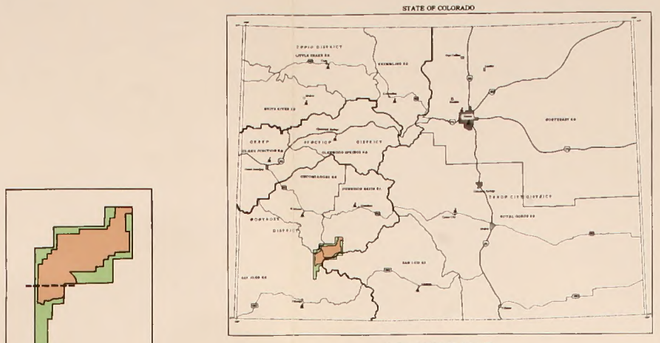
BORROWE

QH 76.5 .C6 68
Proposed wilde
designation o

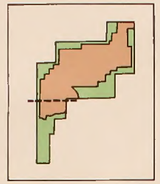
DATE LOANED	BORROWER

USDI – ELM

BLM Library
D-553A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047



LOCATION MAP



1 ½ 0 1 2 3 4 miles

Contour Interval 80 Feet

LEGEND

- PUBLIC LAND (Managed by the Bureau of Land Management)
- NATIONAL FORESTS (Private Land Not Indicated)
- PRIVATELY OWNED LAND
- STATE OWNED MINERALS
- Wilderness Study Area Boundaries
- Conflict Resolutions (I)
- Conflict Resolutions (II)
- Wilderness Manageability Areas
- Wilderness Areas being studied in conjunction with the Forest Service
- Forest Service Wilderness Areas

NOTICE TO MAP USERS

THE SURFACE OWNERSHIP DEPICTED ON THIS MAP WAS COMPILED FROM THE BEST AVAILABLE SOURCE BUT MAY BE OUT OF DATE IN SOME INSTANCES.

FOR MOST CURRENT DATA CONTACT:

BLM GUNNISON RESOURCE AREA OFFICE
216 N. COLORADO
GUNNISON, COLORADO 81230
(303) 641 - 0471

R - 7W

R - 6W

R - 4W

T - 45N

T - 44N

T - 43N

T - 42N

T - 41N

T - 40N

T - 39N

WEMINUCHE CONTIGUOUS

WEMINUCHE STUDY AREA

WEMINUCHE WILDERNESS

WHITEHEAD GULCH

WHITEHEAD GULCH STUDY AREA

WEST NEEDLES CONTIGUOUS

WEST NEEDLES STUDY AREA

NEEDLE CREEK STUDY AREA

BIG BLUE WILDERNESS

AMERICAN FLATS

RED CLOUD PEAK

HANDIES PEAK

POWDERHORN WILDERNESS STUDY AREA

BILL SHARE GULCH

LARSON CREEK

SPARLING GULCH

FRIENDS CREEK

CANNIBAL PLATEAU STUDY AREA

SLUMGULLION SLIDE

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

GUNNISON BASIN AND AMERICAN FLATS/SILVERTON WILDERNESS STUDY AREAS

1986

BLM Library
D-555A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047

UNITED STATES
DEPARTMENT OF THE INTERIOR

Bureau of Land Management
GUNNISON BASIN RESOURCE AREA
216 NORTH COLORADO
GUNNISON, COLORADO 80215

OFFICIAL BUSINESS
Penalty for Private Use, $300

BULK MAIL
POSTAGE & FEES PAID
U.S. DEPARTMENT OF THE INTERIOR
PERMIT NO. G-76